

IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

RUTH SMITH, Individually and as Widow for the)	
Use and Benefit of Herself and the Next Kin of)	
Richard Smith, Deceased,)	
)	
Plaintiff,)	Civil No. 3:05-0444
)	Judge Aleta A. Trauger
v.)	(Dist. Of MA No.
)	1:05-cv-11515PBS)
PFIZER, INC., <i>et al.</i> ,)	
)	
Defendants.)	

**DEFENDANTS' REVISED OBJECTIONS TO
PLAINTIFF'S PROPOSED TRIAL EXHIBITS**

Pursuant to the Court's Scheduling Order of April 30, 2010, as amended orally due to flooding in Nashville,, Defendants, Pfizer Inc and Warner-Lambert Company LLC (collectively, "Defendants" or "Pfizer") herein submit their revised objections to the exhibits identified in Plaintiff's Revised Trial Exhibit List that was served on April 20, 2010.

Following the Court's rulings of April 29, 2010 (Dkt. No. 191) and April 30, 2010 (Dkt No. 199), and after conferring with Plaintiff's counsel, Defendants have revised these objections in two ways. First, Defendants prioritized the plaintiff's exhibits by setting forth those exhibits that are referred to in plaintiff's expert witness statements and in plaintiff's affirmative deposition designations. In this way, those proposed exhibits and defense objections that necessarily will have to be addressed by the Court are brought to the Court's attention at the outset. It is also anticipated that the Court's rulings with respect to these exhibits will provide guidance to the parties and will facilitate the handling of evidentiary objections to other proposed exhibits that may be proffered by plaintiff during the trial. Also, in an effort to not inundate the Court with copies of exhibits that might not be proffered at trial, Defendants initially will provide to

chambers only copies of the proposed plaintiff's exhibits from its exhibit list referenced in either plaintiff's expert witness statements or affirmative deposition designations to which there are objections. Copies of other plaintiff's exhibits or medical articles actually to be proffered at trial will be provided to chambers as necessary.

Second, the objections have been revised to reflect, where possible, the impact of the Court's rulings of April 29 and 30, 2010. Defendants do not withdraw or otherwise waive the objections made in their motions in limine, and the Court's rulings, in many instances, do not address all of the document-specific bases for Defendants' objections. However, the chart below indicates whether the Court's rulings have (1) sustained the Defendants' objections ("S"); (2) overruled the Defendants objections ("O"); (3) only partially addressed the objections ("P"), or (4) did not yet address the objections specific to the document (space left blank).

Defendants reserve the right to assert additional objections to these or other exhibits, including objections to the admission into evidence of medical articles whether or not on the Joint medical literature exhibit list, offered at trial depending upon the evidence presented by Plaintiff and the context of that evidence, the Court's prior evidentiary rulings, and/or other matters that may arise at trial. Accordingly, Defendants respectfully and specifically reserve the right to: (1) withdraw at any time any objections identified; (2) supplement and/or amend their objections; (3) supplemental and/or amend their objections in response to Plaintiff's intended and/or actual use of the exhibits; and (4) supplement and/or amend their objections as otherwise permitted by the Court, even when Defendants presently identify that they have "No Objection" to the proposed exhibits. In addition, Defendants reserve the right to object to any document based on the Rule of Completeness under FRE 106.

DEFENDANTS' OBJECTIONS

Defendants assert the following objections to Plaintiff's exhibits identified by exhibit number. These objections are in addition to any objections made in connection with any expert witness statements or designated deposition testimony.

Authenticity: A document is inadmissible if it is not what the proponent claims it to be. Fed. R. Evid. 901. In addition, pursuant to Rule 36(a)(2) of the Federal Rules of Civil Procedure, a document must be provided with a request for admission "or ha[ve] been otherwise furnished or made available for inspection and copying." Fed. R. Civ. P. 36(a)(2).

Foundation: Out-of-court statements offered for their truth are hearsay not subject to any exception if they are made beyond the scope of a person's regular duties. *See* Fed. R. Evid. 802, 803(6); *see also Redken Labs., Inc. v. Levin*, 843 F.2d 226, 229 (6th Cir. 1988). Also, a non-expert witness may not testify in the form of opinions or inferences beyond those opinions or inferences rationally based on the perception of the witness. *See* Fed. R. Evid. 701.

Hearsay: Evidence is inadmissible if it consists of an out-of-court statement offered for the truth of the matter asserted. Fed. R. Evid. 801, 802; *see also Rush v. Ill. Cent. R.R.*, 399 F.3d 705, 719 (6th Cir. 2005).

Hearsay-within-hearsay: Evidence is inadmissible if it consists of an out-of-court statement offered for the truth of the matter asserted and is hearsay-within-hearsay when those statements themselves contain out-of-court statements offered for the truth of the matter asserted. Each level of hearsay-within-hearsay is inadmissible absent some exception specific to each level. Fed. R. Evid. 805; *see also Smith v. Highland Park Ruritan Club*, No. 3:06-CV-351, 2008 WL 2669107, at *4 (E.D. Tenn. June 27, 2008).

Non-final agency finding: Evidence is inadmissible if it consists of an out-of-court statement offered for the truth of the matter asserted, even when those statements are made by public agencies. Non-final, interim, or draft findings, or personal or other statements not made pursuant to agency authority do not fall under the public record exception to the hearsay rule and are, therefore, inadmissible. *See Toole v. McClintock*, 999 F.2d 1430, 1434-35 (11th Cir. 1993); *City of New York v. Pullman Inc.*, 662 F.2d 910, 915 (2d Cir. 1981) (quoting *United States v. Fosher*, 590 F.2d 381, 383 (1st Cir. 1979)).

Irrelevant: Irrelevant evidence is inadmissible. Fed. R. Evid. 402. Irrelevant evidence does not “tend[] to make the existence of any fact that is of consequence to the determination of the action more probable or less probable than it would be without the evidence.” Fed. R. Evid. 401; *see also United States v. Blackwell*, 459 F.3d 739, 769 (6th Cir. 2006).

Irrelevant: Marketing, advertising, and publications (including other indications):

To the extent that Plaintiff has identified an exhibit to purportedly support allegations of improper marketing, including publications on gabapentin and documents regarding other indications other than the indication for which Decedent was prescribed Neurontin, such exhibit is irrelevant and inadmissible under Rules 401 and 402, the MDL court’s May 26, 2009 Order, and the facts of this case because there is no evidence connecting the exhibit to Decedent’s prescribers or their prescribing decision. (*See* Mem. & Order [1790] at 34, May 26, 2009); *see also In re Seroquel Prods. Liab. Litig.*, No. 06-MD-1769-Orl-22DAB, 2009 WL 223140, at *4-5 (M.D. Fla. Jan. 30, 2009); *Miller v. Pfizer, Inc.*, 196 F. Supp. 2d 1095, 1122-23 (D. Kan. 2002); *Alexander v. Smith & Nephew, P.L.C.*, 90 F. Supp. 2d 1225, 1235 (N.D. Okla. 2000); *In re Norplant Contraceptive Prods. Liab. Litig.*, No. MDL 1038, 1997 WL 81092, at *1 (E.D. Tex. Feb. 21, 1997). Further, this Court’s ruling concerning advertising and marketing is limited to

that which is national in scope and which is relevant to the issue of a duty to test. Defendants do not withdraw or waive the objections previously made and ruled upon. Moreover, many of the documents pertain to global marketing efforts involving countries where Neurontin was approved for more indications than in the United States, proposals or planning documents in anticipation of receiving additional approved indications, or internal documents that do not reflect actual statements made in connection with Neurontin to those outside of the company. Further, to the extent such evidence invites the jury to speculate as to the reasons why Mr. Smith was prescribed Neurontin in 2004, it is unfairly prejudicial and should be excluded.

Irrelevant: Other events: Reports of other events – *i.e.*, use of medications other than Neurontin, adverse event reports with medications other than Neurontin, and/or events other than Decedent's – lack substantial similarity to this case, and are, therefore, inadmissible as evidence of other incidents or accidents pursuant to Rules 401-404. *See Engebretsen v. Fairchild Aircraft Corp.*, 21 F.3d 721, 732-33 (6th Cir. 1994); *Rye v. Black & Decker Mfg. Co.*, 889 F.2d 100, 102-03 (6th Cir. 1989); *Pride v. Bic Corp.*, 54 F. Supp. 2d 757, 760 (E.D. Tenn. 1998) ; *Soldo v. Sandoz Pharms. Corp.*, 244 F.Supp.2d 434, 550–551 (W.D. Pa. 2003); *Wolf v. Proctor & Gamble Co.*, 555 F. Supp. 613, 622 (D.N.J. 1982).

Irrelevant: The *Franklin* litigation and other claims or actions: Evidence from the *Franklin* litigation and other claims, actions, or legal proceedings are inadmissible because they have no tendency to make more or less probable the existence of any fact of consequence. *See, e.g., McLeod v. Parsons Corp.*, 73 F. App'x 846, 853-54 (6th Cir. 2003); *CPC Int'l v. Northbrook Excess & Surplus Ins. Co.*, 144 F.3d 35, 45 (1st Cir. 1998); *Kinan v. City of Brockton*, 876 F.2d 1029, 1034-35 (1st Cir. 1989); *Barnes v. Koppers, Inc.*, No. 3:03CV60-P-D, 2006 WL 940279, at *3 (N.D. Miss. Apr. 11, 2006). In addition to being inadmissible under

Rules 401 and 402, such exhibit is inadmissible under the MDL court's Fraud Order, and the facts of this case because there is no evidence connecting the exhibit to Decedent's prescribers or their prescribing decision.

Irrelevant: Criminal plea: Evidence of the criminal plea is properly excluded because it does not make the existence of a fact of consequence more or less probable. (*See* 5/13/09 Mem. & Order [1780] at 37-38); *see also In re Neurontin Mktg. & Sales Practices Litig.*, 244 F.R.D. 89, 92 n.6 (D. Mass 2007). In addition to being inadmissible under Rules 401 and 402, this exhibit is inadmissible under the MDL court's Fraud Order, and the facts of this case because there is no evidence connecting the exhibit to Decedent's prescribers or their prescribing decision.

Irrelevant: New warning: Under Rule 407, measures taken after an injury or harm allegedly caused by an event, that if taken previously, would have made the injury or harm less likely to occur, are not admissible to prove negligence, culpable conduct, a defect in a product, a defect in a product's design, or a need for a warning or instruction. Fed. R. Evid. 407. Thus, Neurontin's new warning label and patient information guides are inadmissible to show liability under Rule 407. *See Stahl v. Novartis Pharms. Corp.*, 283 F.3d 254, 270 n.10 (5th Cir. 2002); *Lindsay v. Ortho Pharm. Corp.*, 637 F.2d 87, 94 (2d Cir. 1980); *Werner v. Upjohn Co.*, 628 F.2d 848, 854 (4th Cir. 1980); *see also Gray v. Hoffman-La Roche, Inc.*, 82 F. App'x 639, 646 (10th Cir. 2003).

Rule of completeness: When a writing or recorded statement or part thereof is introduced by a party, an adverse party may require the introduction at that time of any other part or any other writing or recorded statement which ought in fairness to be considered

contemporaneously with it. Fed. R. Evid. 106; *see also United States v. Holden*, 557 F.3d 698 (6th Cir. 2009).

Probative value substantially outweighed: To the extent the Court determines that an exhibit objected to by Defendants on any relevancy ground is admissible, the exhibit should still be excluded under Rule 403 because its probative value, if any, is substantially outweighed by the danger of unfair prejudice, confusion of the issues, or misleading the jury, or by considerations of undue delay, waste of time, or needless presentation of cumulative evidence. Fed. R. Evid. 403; *see Old Chief v. United States*, 519 U.S. 172, 180 (1997); *Schrand v. Fed. Pac. Elec. Co.*, 851 F.2d 152, 156 (6th Cir. 1988).

Impermissible character evidence: To the extent plaintiff has identified an exhibit to purportedly show Defendants acted in conformity therewith or to show Defendants “propensity,” such exhibit is inadmissible under Federal Rule of Evidence 404(b). *See McLeod v. Parsons Corp.*, 73 F. App’x 846, 854 (6th Cir. 2003); *Fisher v. Am. Gen. Fin. Co.*, 52 F. App’x 601, 606 07 & n.3 (4th Cir. 2002) (per curiam); *Jankins v. TDC Mgmt. Corp., Inc.*, 21 F.3d 436, 441 (D.C. Cir. 1994); *Crawford v. Yellow Cab Co.*, 572 F. Supp. 1205, 1208-09 (N.D. Ill. 1983).

Missing: To the extent that plaintiff did not provide a copy of their proposed exhibit, Defendants reserve all objections.

INCORPORATION OF DEFENDANTS’ GROUNDS IN MOTIONS *IN LIMINE*

Defendants incorporate herein the grounds set forth in the following motions *in limine*, and continue to object to any exhibit on these grounds, even if the Court has previously ruled on that objection:

1. The guilty plea dated May 13, 2004; any negotiation, settlement, or agreement between Pfizer and/or Warner-Lambert with any government entity arising out of the guilty plea;

or any related government finding or investigation of marketing of Neurontin in violation of the Food, Drug, and Cosmetic Act, and the fact of any such investigation.

2. Evidence offered by Plaintiff to show allegedly improper marketing or other conduct, including any marketing, advertising, or promotional materials or conduct concerning Neurontin (whether for off-label use or otherwise), including but not limited to, evidence of promotion, studies, letters from DDMAC, publications, testimony of sales and marketing representatives other than those who called on Decedent's prescribers, and other evidence not relied upon by Decedent's prescribers, as well as evidence of or reference to any other claims, actions, or legal proceedings related to Neurontin.

3. Any testimony of David Franklin or evidence of, or reference to, the separate and unrelated *qui tam* action styled *United States ex rel. Franklin v. Parke-Davis, Division of Warner-Lambert Company, & Pfizer Inc.*, Civil Action No. 1:96-DV-11651-PBS (D. Mass filed Aug. 13, 1996).

4. All evidence of and references to Food and Drug Administration regulatory actions related to Neurontin, including labeling, labeling changes, and patient information guides for Neurontin, that were issued after Richard Smith's death in May 2004.

5. Conduct unrelated to Neurontin, including (i) an August 31, 2009, settlement among Pfizer, the United States Department of Justice, and certain other government agencies, pursuant to which Pfizer and the Government agreed to settle certain *qui tam* actions against Pfizer involving drugs other than Neurontin and (ii) a plea agreement between the Government and Pharmacia & Upjohn Company, Inc. involving the drug Bextra, as well as any related government finding or investigation in connection with the August 2009 Settlement or Pharmacia Plea.

6. Miscellaneous matters including references to Plaintiff's pleadings; evidence of or references to Defendants' corporate status, size, profits, financial condition, or employee compensation; evidence of or references to alleged conduct of a generic "pharmaceutical industry" or "drug companies"; references to the cost or resources of Defendants' legal defense or to the size, location, other clients, or nature of the legal practice of Defendants' or Plaintiff's law firms; evidence of or references to Defendants' insurance; references to the presence or absence of Defendants' corporate representatives at trial; evidence of or references to how Decedent's beneficiaries will use any jury award if Plaintiff prevails; attempts to instruct the jury as to the effect of its answers to the questions posed in the jury verdict form; references to the Golden Rule; evidence of or references to discovery disputes between the parties or other discovery activities by the parties; and post-mortem photographs.

7. Evidence of or reference to anecdotal adverse event reports.

8. Evidence, references, testimony or argument that Plaintiff's decedent's adult children have suffered any compensable harm as a result of their father's death. Any evidence or argument explicitly or impliedly suggesting that the impact of decedent's suicide on the adult children has any bearing on the amount of "consortium" damages, if any, that the jury might be asked to award to Plaintiff Ruth Smith as a result of her husband's suicide.

9. Testimony of Professor Charles King, III, an economist whom Plaintiff has designated as an expert witness. Professor King's testimony is inadmissible because it is irrelevant to the particular facts of this case, invites speculation, unfairly prejudicial, and the product of unreliable methodology.

**DEFENDANTS' REVISED OBJECTIONS TO PLAINTIFF'S
EXHIBITS REFERENCED IN PLAINTIFF'S EXPERT WITNESS STATEMENTS /
DEPOSITION DESIGNATIONS**

Exhibit Number	Document Description	Defendants' Objections	Expert Statement or Deposition Designation	Impact of Court's MIL Rulings
P-66	Medical Records: Heritage Medical Assocs	Authenticity	Cato	
P-110	Call Notes	Authenticity;Hearsay;Hearsay within hearsay;Relevance	Krancer; Pippin-Moreland	
P-111	Call Notes	Authenticity;Relevance	Krancer; Pippin-Moreland	
P-119	Mackey Call Notes	Authenticity;Relevance	Mackey	
P-121	Information	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing;Relevance: Plea	Taylor; Mackey Pippin-Moreland	O
P-123	Affidavit of David Franklin	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance;Relevance: Marketing;Relevance: Plea	Franklin; Mackey	
P-199	Metropolitan Police Department Homicide Unit Supplemental Report – Richard Smith	No Document Produced	Biggs; Satterfield	
P-2000	Warner-Lambert guilty plea in United States v. Warner Lambert dated June 7, 2004	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing;Relevance: Other Events;Relevance: Plea	Teicher	O
P-2001	Information in United States v. Warner Lambert, dated May 13, 2004	Authenticity;Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing;Relevance: Other Events;Relevance: Plea	Blume Taylor	O
P-2002	Sentencing Memorandum of the United States	Probative Value Outweighed;Relevance: Plea	Teicher	S
P-2003	Division of Neuropharmacological Drug Products Combined Medical-Statistical Review NDA: 20-235, Indication: Adjunctive Medication	Hearsay;Probative Value Outweighed;Relevance: Other Events	Knapp Marino; McCormick; Taylor	

Exhibit Number	Document Description	Defendants' Objections	Expert Statement or Deposition Designation	Impact of Court's MIL Rulings
P-2005	Michael Trimble, Psychosis with Gabapentin (1995);	Authenticity	Trimble	
P-2006	RE: GABA and PMDD	Hearsay within hearsay	Trimble McCormick	
P-2015	Video of July 10, 2008 Advisory Committee Hearing	Hearsay; New Warning	Blume	P
P-2018	FDA Letter to Sponsors 12-2008	Hearsay; Probative Value Outweighed; Relevance: New Warning	Maris	P
P-2020	Disclosure of Information By David Franklin (Exhibit 3)	Hearsay; Hearsay within hearsay; Probative Value Outweighed; Relevance: Marketing; Relevance: Plea	Franklin	
P-2061	Gabapentin Data Capture Aid	Authenticity; Relevance	Blume	
P-2067	Zoloft web site About Zoloft – How Zoloft Works	Relevance	Trimble	
P-2176	Jeffrey Mohan, Gabapentin and Suicide (Mar. 14, 2006)	Relevance; Rule of Completeness	Greenland	
P-2781	E-mail from Larry Alphas to John Marino re: National Public Radio-NEURONTIN Story to be aired TONIGHT	Probative Value Outweighed; Relevance: Other Events	Alphas	
P-2784	E-mail from Christine Aschenbach to Allison Fannon, Larry Alphas, Angela Crespo, Steve Piron, Bruce Parsons, Ellen Dukes re: PSC M	Probative Value Outweighed; Relevance	Alphas	
P-2799	E-mail from Atul Pande to Lloyd Knapp re: GBP in Bipolar Disorder	Irrelevant: Other indications; Probative Value Outweighed; Relevance: Marketing	Pande	
P-2966	E-mail from Lloyd Knapp to Drusilla Scott, Atul Pande, Stephen Gracon, Byron Scott, Robert Michael Poole re: GDRC-Nerve Conductio	Hearsay; Probative Value Outweighed; Relevance	Scott	
P-2971	E-mail from Meg Yoder to John Marino, Christine Grogan, Craig Glover, Suzanne Doft, Marino	Probative Value Outweighed; Relevance: Foreign Labels; Relevance:	Alphas	

Exhibit Number	Document Description	Defendants' Objections	Expert Statement or Deposition Designation	Impact of Court's MIL Rulings
	Garcia, Michael Rowbotham, David Probert, Allison Fannon, Steve Piron, Joan Kaplan, Angela Crespo, Leigh Anne Hemenway, Leslie Tive, Robert Glanzman, Elizabeth Muti	Marketing;Relevance: Publications		
P-2972	E-mail from Nancy Mancini to Lucy Castro, Daphne Nugent Laiken, Manini Patel re: Neurontin sales information needed	Hearsay within hearsay;Probative Value Outweighed;Relevance: Foreign Labels;Relevance: Marketing;Relevance: Other Events	Castro	
P-2973	Presentation: Rationale for a Social Phobia Clinical Program with Neurontin,GDRC Meeting November 8, 2001	Other;Probative Value Outweighed;Relevance	Castro	
P-3057	1998 Neurontin Tactics, Prepared 7-30-97 by Cline, Davis & Mann	Irrelevant: Other indications;Probative Value Outweighed;Relevance: Marketing	Knoop	
P-3129	E-mail from Suzanne Doft to XTEC Media re: NEU-0020634 Employer Ad Bd Slides	Probative Value Outweighed;Relevance	Doft	
P-3133	Suzanne Doft, Individual Development Plan	Probative Value Outweighed;Relevance: Marketing	Doft	
P-3134	Presentation: Incremental Market Potential With An FDA Approved Indication for Neuropathic Pain	Hearsay;Probative Value Outweighed;Relevance: Marketing;Rule of Completeness	Doft	
P-3136	Suzanne Doft, Neurontin Marketing Team Draft, 2002 Personal Goals	Probative Value Outweighed;Relevance: Marketing	Doft	
P-3138	Neurontin, Neuropathic Pain Issues in the Workplace, Meeting Report	Probative Value Outweighed;Relevance	Doft	
P-3412	Key Message Sign-Off Sheet – Neurontin Publication Plan Key Messages	Probative Value Outweighed;Relevance	Glanzman	
P-3442	Mechanisms of action: A Guide for Sales Colleagues	Probative Value Outweighed;Relevance	Glanzman	

Exhibit Number	Document Description	Defendants' Objections	Expert Statement or Deposition Designation	Impact of Court's MIL Rulings
P-3462	Neurontin: 2001 Situation Analysis	Probative Value Outweighed;Relevance: Marketing	Marino	
P-3608	Presentation: Neurontin by Leslie Tive	Hearsay within hearsay;Probative Value Outweighed;Relevance;Relevance: Foreign Labels;Relevance: Marketing	Knapp	
P-3637	Memo from Cynthia de Luise re: Neurontin PMP Team Meeting (09 May 2001) Minutes	Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing	Knapp	
P-3678	E-mail from Clare Cheng to A. Crook re: Neurontin 1997 Tactical Plan	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing	Knoop	
P-3769	Presentation: Quarterly Brand Review Neurontin 4-98	Hearsay;Probative Value Outweighed;Relevance: Marketing	Marino	
P-3772	Global Development Review Committee Meeting, September 19, 2001	Hearsay within hearsay;Probative Value Outweighed;Relevance: Foreign Labels;Relevance: Marketing;Relevance: Other Events	Marino	
P-3773	Presentation: Rationale for an Expanded DPN Clinical Program with Neurontin	Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing	Marino	
P-3777	John Marino 2001 Goals	Hearsay within hearsay;Probative Value Outweighed;Relevance;Relevance: Foreign Labels;Relevance: Marketing	Marino	
P-3778	John Marino OP2002 Goals	Hearsay within hearsay;Probative Value Outweighed;Relevance;Relevance: Foreign Labels;Relevance: Marketing	Marino	
P-3779	WW Neurontin Team 2003 Goals	Hearsay within hearsay;Probative Value	Marino	

Exhibit Number	Document Description	Defendants' Objections	Expert Statement or Deposition Designation	Impact of Court's MIL Rulings
		Outweighed;Relevance: Foreign Labels;Relevance: Marketing		
P-3780	Letter from Norm Phillips, Vice President Physicians' World Communications Group to John Marino re: contract with group in Morris	Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing;Rule of Completeness	Marino	
P-3849	FDA Alert: Information for Healthcare Professionals Suicidality and Antiepileptic Drugs	Probative Value Outweighed;Relevance: New Warning;Rule of Completeness	Blume; Maris; Trimble	P
P-3850	FDA Alert: Information for Healthcare Professionals Suicidality and Antiepileptic Drugs	Authenticity;Probative Value Outweighed;Relevance;Relevance: New Warning;Rule of Completeness	Greenland McCormick	P
P-3851	Record of FDA Contact, Report Outcome of FDA Gabapentin NDA acceptability to file review meeting of 3-11-92	No Objection	McCormick; Turner	
P-3852	Memo from V. Trudeau to R. Delong re: Follow-up Adverse Event Report	Hearsay;Probative Value Outweighed;Relevance: Other Events	McCormick	S
P-3853	Presentation: Suicidality and Anti-Epileptic Drugs: Status of Clinical Trial Data Analysis by Evelyn Mentari MD	Hearsay;Non-final agency finding;Probative Value Outweighed;Relevance	McCormick	
P-3854	Affidavit of David Franklin PhD	Authenticity;Hearsay;Probative Value Outweighed;Relevance: Plea	McCormick	
P-3855	Client Register, Shook, Hardy & Bacon LLP	Hearsay;Probative Value Outweighed;Relevance	McCormick	
P-4062	Marketing Assessment Neurontin in Neuropathic Pain and Spasticity	Relevance: Marketing	Taylor	
P-4081	Parke-Davis Pharmaceutical Research Division of Warner-Lambert Company Research Report Title: Gabapentin Adjunctive Treatment in	Irrelevant: Other indications	Pande	
P-4147	Declaration of Cheryl Blume,	Hearsay;Hearsay within	Blume	

Exhibit Number	Document Description	Defendants' Objections	Expert Statement or Deposition Designation	Impact of Court's MIL Rulings
	PhD	hearsay; Probative Value Outweighed; Relevance; Relevance: Other Events		
P-4159	Declaration of Keith Altman	Hearsay; Hearsay within hearsay; Probative Value Outweighed; Relevance; Relevance: Marketing; Relevance: Other Events	Blume	
P-4207	Gabapentin Mechanism Work Group – Team Charter, September 5, 2000	Authenticity; Hearsay	Scott	
P-4208	Email from John Marino re: Neurontin Labeling – Ground Rules and Agenda – Meeting May 22	Hearsay within hearsay; Probative Value Outweighed; Relevance	Scott	
P-4209	Email from Drusilla Scott re: Neurontin PHN sNDA	Hearsay within hearsay; Relevance	Scott	
P-4212	Letter from Lisa Stockbridge to Lucy Castro re: a model for Neurontin that is in violation of the Federal Food, Drug, and Cosmeti	Probative Value Outweighed; Relevance: Marketing	Scott	
P-4286	Review and Evaluation of Clinical Data, NDA 20-235 Indication: Refractory Epilepsy, January 31, 1992	Hearsay; Hearsay within hearsay; Non-final agency finding; Probative Value Outweighed; Relevance	Teicher	
P-4287	Letter from Lisa Stockbridge to Andrea Garrity re: a slim jim for Neurontin that is misleading and in violation of the Federal Fo	Authenticity; Probative Value Outweighed; Relevance: Marketing	Teicher	
P-4288	Letter from Lisa Stockbridge to Lucy Castro re: a model for Neurontin that is in violation of the Federal Food, Drug, and Cosmeti	Authenticity; Probative Value Outweighed; Relevance: Marketing	Teicher	
P-4289	Settlement Agreement and Release between the United States of America and Pfizer and Warner-Lambert	Hearsay; Hearsay within hearsay; Probative Value Outweighed; Relevance: Marketing; Relevance: Plea	Teicher	
P-4290	United States of America v Warner Lambert Company	Hearsay; Hearsay within hearsay; Probative Value	Teicher	O

Exhibit Number	Document Description	Defendants' Objections	Expert Statement or Deposition Designation	Impact of Court's MIL Rulings
	General Allegations	Outweighed;Relevance: Marketing;Relevance: Plea		
P-4291	Neurontin: 1998 Situation Analysis	Probative Value Outweighed;Relevance: Marketing	Teicher	
P-4292	Email from Elaine Vennard to The Hallelujah Core Team re: Hallelujah Core Team Meeting Minutes – 2-27-01	Hearsay within hearsay;Probative Value Outweighed;Relevance	Teicher	
P-4293	Development Request, Category: Sleep (New), Type of Project: Rx to OTC Switch, Date: March 31, 2003	Probative Value Outweighed;Relevance: Marketing	Teicher	
P-4294	Neurontin: 2001 Operating Plan Executive Summary	Hearsay within hearsay;Privilege;Probative Value Outweighed;Relevance: Foreign Labels;Relevance: Marketing	Teicher	
P-4295	Memo from Mi Dong to Neurontin (Anticonvulsant) Development Team re: Minutes – May 22, 1997, Neurontin Development Team Meeting	Probative Value Outweighed;Relevance: Foreign Labels;Relevance: Marketing;Relevance: Other Events	Teicher	
P-4324	Pfizer Consultants Meeting September 6, 2001	Hearsay within hearsay;Probative Value Outweighed;Relevance	Tive	
P-4384	Memo from O. Brandicourt re: Neurontin Marketing Assessment	Probative Value Outweighed;Relevance: Foreign Labels	Marino; Taylor; Turner	
P-4385	Memo from Mi Dong to Neurontin (Anticonvulsant) Development Team re: Minutes, November 9, 1994, Neurontin Development Strategy Meeting	Relevance	Taylor	
P-4397	Presentation: Neurontin Publications Subcommittee Current Status and 2002 Plans	Hearsay;Hearsay within hearsay;Other;Probative Value Outweighed;Relevance: Marketing	Glanzman	
P-4528	Parke-Davis Memorandum:	Hearsay;Hearsay within	Pande	

Exhibit Number	Document Description	Defendants' Objections	Expert Statement or Deposition Designation	Impact of Court's MIL Rulings
	Meeting Minutes, March 14, 1995, Neurontin Development Team Meeting	hearsay;Irrelevant: Other indications;Probative Value Outweighed;Relevance: Marketing		
P-4550	1998 Neurontin Tactics	Authenticity;Hearsay;Probative Value Outweighed;Relevance: Marketing	Knoop	
P-4581	Official research report from 945-15 Warner-Lambert. (5/8/1990) Adverse Event Information, Patient 945-15-01 #001 RWB. Parke-Davis Pharmaceutical Research Division, Warner-Lambert Company. 101-103, 118, 121, 127.	Authenticity;Probative Value Outweighed;Relevance	Blume	S
P-4712	FDA FOI Documents for Neurontin NDA Approval	Hearsay;Hearsay within hearsay;Non-final agency finding;Probative Value Outweighed;Relevance: Foreign Labels;Relevance: Other Events	Blume	
P-4759	Periodic Safety Update Report Gabapentin February 1, 2003 through January 31, 2004	Relevance: Foreign Labels;Relevance: Other Events	Blume	
P-4765	Research Report No: RR 4192-0166	Relevance	Blume; Trimble	
P-4848	Email sent to Elizabeth Mutisya from John Marino re: POPP Study	Hearsay within hearsay;Probative Value Outweighed;Relevance	Marino	
P-4853	Neurontin 2001 US Operating Plan	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance;Relevance: Marketing;Relevance: Other Events	King Glanzman	P
P-4857	Email sent from Larry Alphs re: Minutes from NeP expert panel	Hearsay within hearsay;Relevance	Marino	
P-4863	Fax transmittal of Exploratory Development Plan for Psychiatric Indications for Gabapentin	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance;Relevance: Foreign	Marino	

Exhibit Number	Document Description	Defendants' Objections	Expert Statement or Deposition Designation	Impact of Court's MIL Rulings
		Labels;Relevance: Marketing		
P-4864	Email sent from Elizabeth Mutisya re: GBP-post amputation pain	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Foreign Labels;Relevance: Marketing;Relevance: Other Events	Marino	
P-4874	Email sent from John Marino to Elizabeth Mutisya re: POPP Study	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Foreign Labels;Relevance: Marketing	Marino	
P-4876	Email sent from Judy Brown re: 25 and 26 Studies	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing	Marino	
P-4877	Email sent to Leslie Tive from John Marino re: 224 Study	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Foreign Labels;Relevance: Marketing;Rule of Completeness	Marino	
P-4887	Parke-Davis Memorandum: Meeting Minutes, March 14, 1995, Neurontin Development Team Meeting	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing	Pande	
P-4889	1998 Neurontin Tactics	Hearsay;Probative Value Outweighed;Relevance: Marketing	Knoop	
P-5150	Parke-Davis Memorandum: Neurontin Marketing Assessment	Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing	Marino; Turner; Taylor	
P-5135	Email sent from Drusilla Scott re: Neurontin PHN SNDA; status and labeling	Hearsay;Rule of Completeness	Knapp	
P-5174	Email sent to Michelle Mays from Leslie Tive re: Neurontin Information	Hearsay;Probative Value Outweighed;Relevance: Marketing	Teicher	
P-5187	PPT slides	Foundation;Hearsay;Rule of Completeness	Teicher	

Exhibit Number	Document Description	Defendants' Objections	Expert Statement or Deposition Designation	Impact of Court's MIL Rulings
P-5190	Periodic Safety Update Report Gabapentin February 1, 1998 through January 31, 2003	Hearsay within hearsay	Blume	
P-5285	Parke-Davis Memorandum: Selected Physician Titration Analysis	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance;Relevance: Marketing	Ford	
P-5349	GBP FOI DOCUMENTS	Hearsay;Hearsay within hearsay	Taylor	
P-5354	Investigator Brochure	Hearsay;Probative Value Outweighed;Relevance;Relevance: Foreign Labels	Trimble	
P-5373	Neurontin Capsules, Tablets and Oral Solution	Hearsay;Probative Value Outweighed	Scott	
P-5392	Undated partial notes re pharmcovigilance. (Pfizer MHauben_0000123-125)	Hearsay;Probative Value Outweighed;Relevance: Marketing; Completeness	Blume	
P-5423	PMO-Pillar Training	Hearsay;Probative Value Outweighed;Relevance: Marketing	Teicher	
P-5747	USA vs. Warner-Lambert Company LLC: Information	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Plea	Taylor	O
P-5748	Judgement for USA vs. Warner-Lambert Company LLC	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Plea	Taylor	
P-5752	Email (January 16, 2003) from John Marino_subj: National Public Radio- Neurontin Story to be aired Tonight	Hearsay within hearsay;Probative Value Outweighed	Taylor	
P-5753	Chart: GABA Elevation Does Not Predict Mechanism of Action or Effects	Authenticity;Hearsay	Taylor	
P-5777	Narrative Review: The Promotion of Gabapentin: An Analysis of Internal Industry Documents	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance;Relevance: Marketing	King	
P-5791	Chart of Gabapentin Reporting Rates	Foundation;Probative Value Outweighed;Relevance;Rule of Completeness	Blume	
P-5800	Email from Wohlberg to	Hearsay;Hearsay within	Blume	

Exhibit Number	Document Description	Defendants' Objections	Expert Statement or Deposition Designation	Impact of Court's MIL Rulings
	Rodriguez Re:Social phobia	hearsay; Probative Value Outweighed; Relevance		
P-5809	Email from Wohlberg to Brandicourt re: FDA teleconference	Probative Value Outweighed;Relevance;Relevance: New Warning	Blume	
P-5858	Email sent from John Marino October 16, 2001 re: Gabapentin Neuropathic Pain Indication	Hearsay within hearsay	Scott	
P-5869	Antiepileptic drugs and risk of suicide: a nationwide study. Olesen et al. Pharmaceutical and Drug Safety 2010.	Hearsay; Hearsay within hearsay; Untimely for expert reliance; no statistically significant	Blume; Maris; Greenland; Trimble	
P-5870	Anticonvulsant Medications and the Risk of Suicide, Attempted Suicide, or Violent Death. Patorno et al. JAMA 303:14 1401	Hearsay; Hearsay within hearsay; Untimely for expert reliance; exploratory only study and not reliable methodology to prove association and/or causation	Blume; Maris; Greenland; Trimble	
D-29	Richard Smith's University Medical Center, MedicalRecords.		Trimble (p. 14-20)	
D-210	Letter from M. Richer to A. Seaton re: additional Information.		Maris	
D-215	Photograph of Dresser Top with Suicide Note		Biggs	
D-216	Photograph of Dresser Top without Suicide Note		Biggs	
D-7115	Center for Drug Evaluation and Research. Division Director Review and Basis for Approval Action for NDAs 21-397, 21-423, and 21-424. Dr. Cynthia McCormick.		McCombs	
D-7116	Minutes of Teleconference with FDA bearing the bates range Pfizer_LCastro_0011772 - 76		Scott	
D-7245	December 1992 Advisory Committee Meeting Transcript Vol. II.		Knapp	
D-7411	9/13/07 Affidavit of Dr. Cynthia McCormick, M.D. with exhibits.		McCormick	

Exhibit Number	Document Description	Defendants' Objections	Expert Statement or Deposition Designation	Impact of Court's MIL Rulings
D-7435	Atul C. Pande, M.D. CV bearing the bates range Pfizer APande_0000352 - 54.		Pande	
J-322	American Psychiatric Association. APA Practice Guidelines for the Assessment and Treatment of Patients with Suicidal Behaviors. American Journal of Psychiatry 2004; 160 (11).		Trimble	
J-362	Ben-Menachem E, Soderfelt B, Hamberger A, Hedner T, Persson LI. Seizure frequency and CSF parameters in a double-blind placebo controlled trial of Gabapentin in patients with intractable complex partial seizures. Epilepsy Research 1995; 21(3):231-236.		Trimble	
J-460	Collins JC, McFarland BH (2007): Divalproex, lithium and suicide among Medicaid patients with bipolar disorder. J Affect Disord. 2007		Maris	
J-489	Dooley DJ, Donovan CM, Pugsley TA. Stimulus-dependent modulation of [3H]norepinephrine release from rat neocortical slices by Gabapentin and Pregabalin. J Pharmacol Exp Ther 2000; 296(3):1086-1098.		Trimble	
J-492	Dooley DJ, Taylor CP, Donevan S, Feltner D. Ca ²⁺ channel α 2- δ ligands: Novel modulators of neurotransmission. Trends in Pharmacological Sciences 2007;28(2):75-82.		Taylor	
J-585	Gibbons, R.D., Hur, K., Brown, C.H., Mann, J.J. The		Greenland	

Exhibit Number	Document Description	Defendants' Objections	Expert Statement or Deposition Designation	Impact of Court's MIL Rulings
	Relationship Between Antiepileptics and Suicide Attempts in Patients with Bipolar Disorder, Arch Gen Psychiatry. 2009;66(12):1354-1360. (2009)			
J-860	Petroff OA, Hyder F, Rothman DL, Collins TL, Mattson RH. Gabapentin increases human brain GABA within one hour. Epilepsia 1998; 39(Suppl. 6):71.		Trimble	
J-861	Petroff OA, Hyder F, Rothman DL, Mattson RH. Effects of Gabapentin on brain GABA, homocarnosine, and pyrrolidinone in epilepsy patients. Epilepsia 2000; 41(6):675-680.		Trimble	
J-885	Radley DC, Finkelstein SN, Stafor RS. Off-label prescribing among office-based physicians. Arch Intern Med 2006; 166: 1021-1026. 2206		King	
J-939	Schmitz B. Effects of antiepileptic drugs on mood and behavior. Epilepsia 2006; (47) (supp. 2):28-33.		Trimble	
J-959	Sills GJ. The mechanisms of action of Gabapentin and pregabalin. Current Opinion in Pharmacology 2006; 6(1):108-113.		Trimble	
J-1040	Trimble MR. Biological Psychiatry, Second Edition. (1996)		Trimble	
N/A	Brawek article: Differential modulation of K+-evoked 3H-neurotransmitter release from human neocortex by gabapentin and pregabalin, <u>Naunyn-Schmiedeberg's Arch Pharmacol</u>	Not on Exhibit List	Blume; Trimble	

Exhibit Number	Document Description	Defendants' Objections	Expert Statement or Deposition Designation	Impact of Court's MIL Rulings
	(2008)			
N/A	Brown and Linoila's article: CSF serotonin metabolite (5-HIAAA) studies in depression, impulsivity and violence, in Journal of Clinical Psychiatry (1990)	Not on Exhibit List	Trimble	
N/A	Asberg and Shalling's article titled: Psychobiology of suicide, impulsivity, and related phenomena. In the textbook of Psychopharmacology: Third Generation of Progress (1987).	Not on Exhibit List	Trimble	
N/A	Mayeux, Stern and Williams article titled: Altered serotonin metabolism in depressed patients with Parkinson's disease, in Journal of Neurology (1984).	Not on Exhibit List	Trimble	
N/A	1/30/03 Email from Allison Fannon to Douglas Shapiro re: YOUR APS POSTER	Not on Exhibit List	Alphs	
N/A	2002 PDR Supplement B Neurontin Entry	Not on Exhibit List	Castro	
N/A	9/13/96, 8/22/96, 8/26/96, 9/9/96 Letters to Franklin from Johnson	Not on Exhibit List	Franklin	
N/A	3/96-7/96 Calendar with witness's handwriting notations	Not on Exhibit List	Franklin	
N/A	11/6/1995 Non-Epileptic Uses of Gabapentin Consultant Meeting Key Learnings	Not on Exhibit List	Ford	
N/A	Robert Glanzman Job Profile	Not on Exhibit List	Glanzman	
N/A	4/25/01 Letter from Drusilla Scott re: Labeling Review for Proposed US Package Insert for Neurontin Neuropathic Pain Supplemental NDA	Not on Exhibit List	Knapp	
N/A	October 2001 Assessment of Psychiatrist Usage of Anti-Convulsant Medications	Not on Exhibit List	Knapp	
N/A	11/8/95 Memo from John Marino to Edda Guerro re: Neurologists Who Specialize in the Treatment	Not on Exhibit List	Marino	

Exhibit Number	Document Description	Defendants' Objections	Expert Statement or Deposition Designation	Impact of Court's MIL Rulings
	of PAIN			
N/A	Neurontin Publication Subcommittee Review	Not on Exhibit List	Pande	
N/A	Slide Presentation: The Making of a Champion	Not on Exhibit List	Pippin-Moreland	
N/A	Email from Jeffrey Dodd re: Q&A Backgrounder on suicide issue for distribution to PD2, Vista RX and Neurology	Not on Exhibit List	Pippin-Moreland	
N/A	Early version of P-5753	Not on Exhibit List	Taylor	

REMAINING PLAINTIFFS' PROPOSED TRIAL EXHIBITS

Exhibit Number	Document Description	Defendants' Objections	Impact of Court's Ruling
P-108	Smith Family DVD	Relevance; Probative Value Outweighed	
P-112	Samples	Authenticity;Relevance	
P-113	XLS of McCombs NDC data	Authenticity;Relevance	
P-114	Call Notes	Authenticity;Relevance	
P-2007	FDA Advisory Committee meeting slide presentation by Dr. J Cramer on July 10, 2008	Document Not Produced	
P-2008	FDA. Joint Meeting of the Peripheral and Central Nervous System Drugs Advisory Committee and the Psychopharmacologic Drugs Adviso	Relevance: New Warning	
P-2011	GlaxoSmithKline Lamictal slide presentation at FDA Advisory Committee Meeting on July 10, 2008	Document Not Produced	
P-2012	Katz R. Memorandum. Briefing Document for the July 10,2008 FDA Advisory Committee Meeting to Discuss Antiepileptic Drugs (AEDs) a	Authenticity;Hearsay	
P-2017	FDA Alert May 5, 2009	Hearsay;Probative Value Outweighed;Relevance: New Warning	

Exhibit Number	Document Description	Defendants' Objections	Impact of Court's Ruling
P-2018	FDA Letter to Sponsors 12-2008	Hearsay;Probative Value Outweighed;Relevance: New Warning	
P-2019	Neurontin Label April 2009	Probative Value Outweighed;Relevance: New Warning	
P-2021	Crone Notice to Admit 11-29-2006	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing;Relevance: Other Events	
P-2022	Crone Defendant Responses to Notice to Admit 2-5-2007	Hearsay;Probative Value Outweighed;Relevance: Other Events	
P-2023	Crone Defendant Responses to Notice to Admit 7-31-2007	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing;Relevance: Other Events	
P-2024	Crone Defendant Responses to Notice to Admit 12-7-2007	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing;Relevance: Other Events	
P-2041	Curriculum Vitae of Dr. Michael Robert Trimble	Hearsay;Probative Value Outweighed;Relevance	
P-2046	label for Neurontin (gabapentin capsules, tablets and oral solution) distributed by Parke-Davis, Revised January 2007	Relevance	
P-2054	excerpts of David J. Rowbotham, Clinical Expert Report and Written Summary of Clinical Studies, Neuropathic Pain, Neurontin Capsul	Rule of Completeness	
P-2055	excerpts from custodial file C. Taylor Gabapentin: Pharmacology Written Summary	Rule of Completeness	
P-2073	excerpt of Food and Drug Administration, HHS, 21 CFR Ch. I (4-1-07 Edition) §201.57	Hearsay;Rule of Completeness	
P-2078	Pfizer Global Research and Development Research Report No.: RR-REG 720-30134 (November 28, 2001)	Rule of Completeness	

Exhibit Number	Document Description	Defendants' Objections	Impact of Court's Ruling
P-2079	Parke-Davis Pharmaceutical Research Division Memorandum from V. Trudeau to R. DeJong (May 8, 1990)	Probative Value Outweighed;Relevance;Relevance: Other Events	
P-2084	Defendant Lyrica Risk Management Committee Meeting, Power Point of Rachel E. Sobel, Epidemiology and Risk Management (September 1	Probative Value Outweighed;Relevance;Relevance: Other Events	
P-2088	Curriculum Vitae of Cheryl D. Blume, Ph.D.	Hearsay;Probative Value Outweighed;Relevance	
P-2089	United States Patent No. 4,910,023 (March 20, 1990)	Probative Value Outweighed;Relevance	
P-2090	Declaration of Keith Altman (April 4, 2008)	Hearsay;Probative Value Outweighed;Relevance: Other Events	
P-2105	page from the Neurontin NDA 20-235 which includes listing of patents	Hearsay;Probative Value Outweighed;Relevance;Rule of Completeness	
P-2106	portion of FDA's clinical review of Neurontin associated with the 2002 approval for post herpetic neuralgia (PHN) dated May 24, 2	Hearsay;Probative Value Outweighed;Relevance: Other Events;Rule of Completeness	
P-2107	portion of the Gabapentin Pediatric Integrated Summary of Safety dated December 3, 1999	Other;Probative Value Outweighed;Relevance;Rule of Completeness	
P-2109	Appendix C.55 of Pfizer's Integrated Summary of Safety for the Post Herpetic Neuralgia NDA dated August 6, 2001	Probative Value Outweighed;Relevance;Relevance: Other Events	
P-2110	chart created under F.R.E 1006 entitled Percentage of Serious Reports for Suicidal and Self Injurious Behaviors(HLT) By Indicatio	Authenticity;Hearsay;Probative Value Outweighed;Relevance: Other Events	
P-2115	memorandum from Maribeth Lazzaro, Ph.D. to Tina Carriero, dated May 13, 2005	Relevance	
P-2118	pages from the transcript of the December 14, 1992 meeting of FDA's Peripheral and Central Nervous Systems Drugs Advisory Committ	Authenticity;Hearsay;Rule of Completeness	

Exhibit Number	Document Description	Defendants' Objections	Impact of Court's Ruling
P-2127	letter from Lisa Stockbridge of FDA to Andrea Garrity of Pfizer, dated June 29, 2001	Hearsay;Non-final agency finding;Probative Value Outweighed;Relevance;Relevance: Marketing	
P-2128	FDA alert concerning Gabitril dated February 18, 2005 printed from the FDA website, www.fda.gov	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Other Events	
P-2129	portion of the product label for Avonex	Hearsay;Probative Value Outweighed;Relevance;Relevance: Other Events	
P-2135	chart created under F.R.E 1006 entitled Cumulative Percentage Reports of Suicidal and Self Injurious behavior(HLT) for Neurontin	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Other Events	
P-2136	chart created under F.R.E 1006 entitled High Level Terms Greater than 1% of Serious Adverse Event Reports Through March 31, 2002	Authenticity;Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Other Events	
P-2138	e-mail from Dennis Kargman, dated March 6, 2006, with Gabapentin Data Capture Aid attached	Probative Value Outweighed;Relevance: Other Events	
P-2145	portion of a PowerPoint Presentation entitled Clinical Development in the Slipstream of Gabapentin	Probative Value Outweighed;Rule of Completeness	
P-2146	portion of a document entitled Neurontin Product Monograph.	Rule of Completeness	
P-2154	21. C.F.R. § 314.70. Ch. I (4-1-06 Edition)	Hearsay	
P-2159	portion of Appendix C.3. of Parke-Davis Research Report 720-02957 entitled Narrative Summaries and Tabular Data for Study Partici	Rule of Completeness	
P-2169	FDA Manual of Policies and Procedures policy MAPP 6020.10 dated July 2, 2003 concerning Dear Health Care Professional letter	Hearsay;Relevance	
P-2342	ECF 1761 Declaration of Ilyas Rona Exhibit 0178: PFIZER_LKNAPP_0050385	Hearsay;Hearsay within hearsay	
P-2366	ECF 1761 Declaration of Ilyas Rona Exhibit 0218: PFIZER_LESLIETIVE_0020631	Hearsay within hearsay;Relevance	

Exhibit Number	Document Description	Defendants' Objections	Impact of Court's Ruling
P-2477	ECF 1761 Declaration of Ilyas Rona Exhibit 0369: 995-00070_945-211 (Part I)	Rule of Completeness	
P-2502	ECF 1761 Declaration of Ilyas Rona Exhibit 0397: PFIZER_LKNAPP_0023336	Probative Value Outweighed;Relevance: Marketing	
P-2543	ECF 1761 Declaration of Ilyas Rona Exhibit 0445: FDA Approved Labeling Text dated February 2005	Relevance	
P-2743	ECF 1761 Declaration of Ilyas Rona Exhibit 0663: 720-04378	Rule of Completeness	
P-2744	ECF 1761 Declaration of Ilyas Rona Exhibit 0664: 720-04483 (Official)	Rule of Completeness	
P-2745	ECF 1761 Declaration of Ilyas Rona Exhibit 0665: 720-04479	Rule of Completeness	
P-2746	ECF 1761 Declaration of Ilyas Rona Exhibit 0666: 720-04455	Rule of Completeness	
P-2747	ECF 1761 Declaration of Ilyas Rona Exhibit 0667: 720-04471	Rule of Completeness	
P-2787	E-mail from Kirk Taylor to Leslie Tive & Timothy Hsu re: Professor Martin Koltzenburg question	Other Indications;Probative Value Outweighed;Relevance	
P-2788	E-mail from Cathy Sigler to Leslie Tive re: Neurontin NPR Story-Med Info Q&A	Hearsay;Probative Value Outweighed;Relevance	
P-2789	Presentation: Suicidality: The Problem and Emerging Solutions by Larry Alphs	Authenticity;Rule of Completeness	
P-2790	E-mail from Larry Alphs to Cathy Sigler & Leslie Tive re: Robert Siegel, host	Hearsay;Irrelevant: Other indications	
P-2806	Generic Dear Sponsor Letter re: new drug application	Hearsay;Non-final agency finding;Probative Value Outweighed;Relevance: New Warning;Relevance: Other Events	
P-2810	Finkelstein Neurontin November 12, 2007	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Foreign Labels;Relevance: Marketing;Relevance: Other Events;Relevance: Plea	

Exhibit Number	Document Description	Defendants' Objections	Impact of Court's Ruling
P-2812	Guidance for Industry, Good Pharmacovigilance Practices and Pharmacoepidemiologic Assessment March 2005	Hearsay	
P-2813	Chart of suicide and self-injurious behaviour	Foundation;Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Other Events	
P-2866	Gabapentin for acute and chronic pain (Review) The Cochrane Collaboration	Hearsay	
P-2887	Rheumatology Orthopedic Neurology Team Challenges and Opportunities	Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing	
P-2898	E-mail from Tamela Martin to Louis Burke, Jefferson Campbell, Jeffrey Dodd, Craig Glover, Edwin McDaries, Daniel Morgan, Nicole P	Other;Probative Value Outweighed;Relevance: Marketing;Rule of Completeness	
P-2902	E-mail from Frederick Schmalberger to Stephen Sacchetti, Kurt Phillips and Mark Brown re: NEU-0183019 New Gabapentin Article in M	Probative Value Outweighed;Relevance: Marketing	
P-2908	Agents of Change Journal Club Report, RON Specialty Representative: Sean Chase, Meeting Month: June 2002	Probative Value Outweighed;Relevance: Marketing	
P-2910	Pfizer FYI only: Neurontin – Make it your #1 add on Therapy Start with Efficacy End with Efficacy	Foundation;Probative Value Outweighed;Relevance: Marketing	
P-2912	E-mail from Mark Brown re: phn notes, Summary notes from David Fantini's team	Other;Probative Value Outweighed;Relevance: Marketing	
P-2919	E-mail from Mark Brown to Daniel Linden,Suzanne Doft, Tamela Martin, Christopher Dowd and David Probert re: Topamax moving up wit	Probative Value Outweighed;Relevance	
P-2921	NTN 2003 Operating Plan	Probative Value Outweighed;Relevance: Marketing	
P-2922	E-mail from Suzanne Doft to Shilpa Patel re: NEU-0020717 Neurontin Advisory Boards, first recommendation to the board	Probative Value Outweighed;Relevance: Marketing	

Exhibit Number	Document Description	Defendants' Objections	Impact of Court's Ruling
P-2970	E-mail from Marino Garcia to Angela Crespo, Michael Rowbotham, David Probert, John Marino, Joan Kaplan, Kenna Reehil, Valerie Fla	Hearsay within hearsay;Other;Relevance: Foreign Labels;Relevance: Marketing;Rule of Completeness	
P-2982	Letter from Lisa Stockbridge, Ph.D, Regulatory Reviewer to Lucy Castro re: NDA #s 20-235, 20-882 Neurontin (gabapentin) MACMIS #1	Hearsay;Non-final agency finding;Other;Probative Value Outweighed;Relevance: Marketing	
P-2983	Letter from Lisa Stockbridge, Ph.D, Regulatory Reviewer to Andrea Garrity re: NDA #s 20-235, 20-882 Neurontin (gabapentin) MACMIS	Hearsay;Non-final agency finding;Other;Probative Value Outweighed;Relevance: Marketing	
P-2988	E-mail from Manini Patel to Rudolf Altevogt, Bruce Parsons, Lloyd Knapp, Ileen Roos, Larry Alphs, Lucy Castro, Claire Wohlhuter,	Hearsay	
P-3022	Memo from Edda Guerrero re: Neurontin Tactics Planning Meeting	Relevance: Marketing	
P-3023	1997 National Strategies and Tactics	Probative Value Outweighed;Relevance: Marketing	
P-3042	Neurontin War Games Summary Report, April 3, 1996	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing	
P-3049	Presentation: Toolbox Meeting, January 30, 1997	Probative Value Outweighed;Relevance: Marketing	
P-3051	Memo from Clare Cheng & Carla Dago to A. Crook, J. Knoop, J. Rizzo, L. Ciancio, M. Friedman, S. Miller, D. Saltel, T. Albright re	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing	
P-3056	Neurontin gabapentin capsules New Hire Training, October 14, 1997	Probative Value Outweighed;Relevance: Marketing	
P-3065	1999 Marketing Plan Neurontin	Hearsay;Probative Value Outweighed;Relevance: Marketing	
P-3068	Neurontin 2003 Publications Plan Review of Capabilities and Strategic Plan, September 2002	Probative Value Outweighed;Relevance	

Exhibit Number	Document Description	Defendants' Objections	Impact of Court's Ruling
P-3071	E-mail from Robert Glantzman to David Cooper, Allison Fannon, Angela Crespo, Bruce Parsons, David Probert, Suzanne Doft, Erica Jo	Hearsay within hearsay; Probative Value Outweighed; Relevance; Relevance: Foreign Labels	
P-3091	E-mail from David Cooper to Angela Crespo, Robert Glanzman, Sue Huang re: Backonja, proposed use of the non-peer reviewed IASP po	Authenticity; Hearsay; Hearsay within hearsay; Probative Value Outweighed; Relevance: Marketing	
P-3111	Neurontin Market Overview	Probative Value Outweighed; Relevance: Marketing	
P-3114	1998 Marketing Plan, Neurontin	Probative Value Outweighed; Relevance: Marketing	
P-3118	Handwritten Memo from Trevor Polischuk to Laura re: data useful for Neurontin in neuropathic pain	Probative Value Outweighed; Relevance: Marketing	
P-3120	Memo from Lynne Fredericks re: Anticonvulsant Market New Patient Starts – January 1999 Data	Probative Value Outweighed; Relevance	
P-3121	Memo from Lynne Fredericks re: Anticonvulsant Market New Patient Starts – April 1999 Data	Probative Value Outweighed; Relevance	
P-3122	Memo from Lynne Fredericks re: Anticonvulsant Market New Patient Starts – June 1999 Data	Probative Value Outweighed; Relevance	
P-3123	New Prescriptions Chart	Hearsay within hearsay; Probative Value Outweighed; Relevance	
P-3124	Neurontin: 1999 Situation Analysis	Hearsay within hearsay; Probative Value Outweighed; Relevance: Marketing; Relevance: Other Events	
P-3135	Presentation: Neuropathic Pain Positioning Strategy Research-Final Results from the U.S.	Hearsay; Probative Value Outweighed; Relevance: Marketing	
P-3143	E-mail from John Marino re: NEU-0006528 OP2002 Review	Probative Value Outweighed; Relevance: Marketing; Relevance: Other Events	

Exhibit Number	Document Description	Defendants' Objections	Impact of Court's Ruling
P-3145	Presentation: Neurontin-Pregabalin Strategic Priorities Discussion, June 10, 2003	Probative Value Outweighed;Relevance: Foreign Labels;Relevance: Marketing;Relevance: Other Events	
P-3153	E-mail from Clare Kennedy to Suzanne Doft, Joe Butera, David Probert, Avanish Mishra, Andrea Zeuschner re: Lost revenue in Top 3	Probative Value Outweighed;Relevance	
P-3156	Presentation: Neurontin, Performance, Market Overview, Opportunities-Strategies, Medical Platform, Finances	Authenticity;Hearsay;Probative Value Outweighed;Relevance	
P-3157	E-mail from Angela Crespo to Christine Aschenbach, Allison Fannon re: Reckless contact information	Probative Value Outweighed;Relevance	
P-3161	E-mail from Larry Alphs re: Neurontin in the WSJ and NY Times Today – December 20, 2002	Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing;Relevance: Plea	
P-3165	E-mail from Timothy Hylan to Lois Fitton, Richard O'Sullivan, Steve Romano, Jim Sage, Christopher Dowd re: NEU-0085355 Some infor	Irrelevant: Other indications;Probative Value Outweighed;Relevance	
P-3166	E-mail from Claire Wohlhuter to Lloyd Knapp re: Q&A Backgrounder on suicide issue for distribution to PD2, Vista RX and Neurology	Relevance	
P-3179	Draft: 2003 Unabridged Neurontin Medical Operating Plan, July 16, 2002	Probative Value Outweighed;Relevance	
P-3198	2003 Neurontin Strategic and Tactical Planning Meeting July 31, 2002	Probative Value Outweighed;Relevance	
P-3199	Memo from Cynthia de Luise re: Neurontin Product Maintenance and Pharmacovigilance (PMP) Team Meeting Minutes (17 January 2002)	Probative Value Outweighed;Relevance	
P-3209	Presentation: Neurontin 2001 U. S. Operating Plan, October 11, 2000	Probative Value Outweighed;Relevance: Marketing	

Exhibit Number	Document Description	Defendants' Objections	Impact of Court's Ruling
P-3210	Presentation: Neurontin Global Operating Plan 2001	Probative Value Outweighed;Relevance: Foreign Labels;Relevance: Marketing	
P-3211	Neurontin Publication Planning Meeting July 12, 2001	Probative Value Outweighed;Relevance	
P-3277	Parke-Davis Pharmaceutical Research Division Research Report No. RR-X 720-02455 Titled: Investigator's Brochure – Gabapentin (CI-	Authenticity;Rule of Completeness	
P-3294	E-mail from Andrea Garrity to Lucy Castro, Manini Patel re: Policy on reprints-Washington Legal Foundation Ruling	Probative Value Outweighed;Relevance;Relevance: Marketing	
P-3297	E-mail from John Marino re: DPC Neurontin – Final	Relevance;Relevance: Foreign Labels	
P-3303	E-mail from John Wolleben to Lucy Castro, Martha Brumfield, Andrew Clair, Andrea Garrity re: Neurontin NOV	Probative Value Outweighed;Relevance: Marketing	
P-3304	Summary of Spontaneous Post-Marketing Reports for Gabapentin, as of December 31, 2000	Probative Value Outweighed;Relevance	
P-3309	E-mail from Lucy Castro to Valerie Flapan, Andrea Garrity re: Neurontin Major Markets Business Plan	Hearsay within hearsay;Other;Probative Value Outweighed;Relevance: Foreign Labels;Relevance: Marketing	
P-3343	Assessment of Suicide and Related Behaviors in Patients Treated with the – Ligands, Gabapentin and Pregabalin, April 29, 2008	Hearsay within hearsay;Relevance: New Warning	
P-3345	Letter from Molly Powers to Russell Katz re: NDA 21-446-Lyrica (pregabalin) Capsules C-V, Request for Information – Response to F	Relevance	
P-3352	Robert Gibbons invoices to Wheeler Trigg and Kenedy LLP	Hearsay	
P-3354	Chart: All Diags for Bipolar	Hearsay;Probative Value Outweighed;Relevance: Other Events	
P-3373	SAS Output	Hearsay	

Exhibit Number	Document Description	Defendants' Objections	Impact of Court's Ruling
P-3385	Presentation: Statistical Issues in Drug Safety: The curious case of Anti depressants, Anticonvulsants,..., and Suicide	Hearsay	
P-3402	E-mail from Robert Glanzman re: Neurontin Product Profiles	Hearsay within hearsay;Relevance;Relevance: Foreign Labels	
P-3404	Presentatin dated May 23, 2001	Probative Value Outweighed;Relevance	
P-3410	Presentation: Roles and Responsibilities for Manuscript Teams	Probative Value Outweighed;Relevance	
P-3436	E-mail from John Marino re: Neurontin Overdose Reported	Probative Value Outweighed;Relevance: Other Events	
P-3437	E-mail from Robert Glanzman to John Marino re: Neurontin Overdose Reported	Probative Value Outweighed;Relevance: Other Events	
P-3438	E-mail from Robert Glanzman re: Post Herpetic Neuralgia	Probative Value Outweighed;Relevance;Relevance: Other Events	
P-3439	E-mail from Robert Glanzman re: Neurontin News, the data in bipolar disease with gabapentin isn't very good	Hearsay;Relevance	
P-3450	NTN 2003 Operating Plan, Strategies and Tactics	Relevance: Marketing	
P-3461	NTN 2003 Operating Plan – Strategies and Tactics	Hearsay within hearsay;Relevance: Marketing	
P-3463	Letter from Lesley Frank to William Merino re: Parke-Davis promoting Neurontin for off-label uses	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing	
P-3484	Corporate Integrity Agreement between the Office of Inspector General of the Department of Health and Human Services and Pfizer	Probative Value Outweighed;Relevance: Plea;Rule of Completeness	
P-3520	Letter from Paula Trushin to James Jefferson re: article Benzodiazepines and Anticonvulsants for Social Anxiety Disorder (Social	Hearsay within hearsay;Other;Probative Value Outweighed;Relevance;Relevance: Marketing	

Exhibit Number	Document Description	Defendants' Objections	Impact of Court's Ruling
P-3521	Letter from James Jefferson to Jane Byun re: Benzodiazepines and Anticonvulsants for Social Anxiety Disorder (Social Phobia)	Hearsay within hearsay; Probative Value Outweighed; Relevance; Relevance: Marketing	
P-3538	Neurontin U.S. Market Update November 2000	Authenticity; Hearsay within hearsay; Probative Value Outweighed; Relevance: Marketing	
P-3551	21 CRF (4-1-06 Edition), Change in ownership of an application	Hearsay	
P-3554	Periodic Safety Update Report for: Gabapentin, August 1, 1998 – January 31, 1999	Relevance: Foreign Labels	
P-3556	request for additional trial-level information pertaining analysis of suicidal thoughts and behavior in anti-epileptic drugs	Hearsay within hearsay	
P-3557	Division of Neuropharmacological Drug Products Combined Medical-Statistical Review, NDA: 20-235, Indication: Refractory Partial E	Hearsay within hearsay; Probative Value Outweighed; Relevance: Other Events	
P-3594	Letter from Russell Katz to Robert Clark re: safety labeling changes	Hearsay within hearsay; Probative Value Outweighed; Relevance: New Warning	
P-3617	E-mail from Robert Glanzman to Jill Kerrick-Walker re: GBP and mood	Hearsay within hearsay; Probative Value Outweighed; Relevance	
P-3651	Fax from Lisa Stockbridge to Andrea Garrity re: NDA #21-129 Neurontin (gabapentin) Oral Solution, MACMIS #9821, comments on propo	Hearsay; Probative Value Outweighed; Relevance; Relevance: Marketing	
P-3653	E-mail from Drusilla Scott re: Agency version of Neurontin Label (action date of 4/24/02 targeted) Emergency meeting of LSC	Non-final agency finding	
P-3683	Neurontin (gabapentin) Program Overview, Feb. 23, 1999	Hearsay within hearsay; Probative Value Outweighed; Relevance: Marketing	
P-3724	Research Report titled: An Iterim Report on an Open-Label, Uncontrolled, Multicenter Study to Determine the Long Term Safety and	Hearsay within hearsay; Probative Value Outweighed; Relevance: Other Events	

Exhibit Number	Document Description	Defendants' Objections	Impact of Court's Ruling
P-3729	Research Report: Integrated Summary of Safety Information of Gabapentin Capsules (Item 8.6 of the gabapentin NDA)	Authenticity	
P-3747	Presentation: Neurontin OP Presentation Market Analytics Review, Nancy Mancini, May 1, 2001	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing	
P-3748	Memo from Cynthia de Luise re: Draft: Neurontin PMP Team Meeting (09 May 2001) Minutes	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Foreign Labels;Relevance: Marketing	
P-3750	E-mail from Nancy Mancini to Avanish Mishra re: Update request, NTN's uses by indication	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing	
P-3764	Presentation: Market Analytic Update	Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing	
P-3770	Neurontin Proposed Strategies and Tactics	Probative Value Outweighed;Relevance: Marketing	
P-3775	E-mail from John Marino to Stephen Graco, Lloyd Knapp, Atul Pande, Drusilla Scott, Byron Scott re: GDRC – Nerve Conduction Discussion	Hearsay;Relevance	
P-3776	E-mail from Kirk Taylor re: My thoughts on the POPP Study Investigator meeting	Authenticity;Hearsay	
P-3783	E-mail from John Marino to Marino Garcia re: Neurontin in Bipolar Disorder	Hearsay within hearsay;Probative Value Outweighed;Relevance	
P-3785	Letter from Lesley Frank, Department of Health & Human Services to William Merino re: Parke-Davis promoting Neurontin for off lab	Hearsay;Hearsay within hearsay;Non-final agency finding;Probative Value Outweighed;Relevance: Marketing	
P-3787	Memo from Cynthia de Luise re: Draft: Neurontin PMP Team Meeting (09 May 2001) Minutes	Hearsay;Probative Value Outweighed;Relevance: Foreign Labels;Relevance: Marketing;Relevance: Other Events	
P-3788	Slide titled: Neurontin (drug uses)	Rule of Completeness	

Exhibit Number	Document Description	Defendants' Objections	Impact of Court's Ruling
P-3790	Slides: US Neurontin Use Data	Hearsay; Probative Value Outweighed; Relevance: Foreign Labels; Relevance: Marketing	
P-3791	Letter from Lisa Stockbridge to Lucy Castro re: a model for Neurontin that is in violation of the Federal Food, Drug, and Cosmetic Act	Non-final agency finding; Probative Value Outweighed; Relevance; Relevance: Marketing	
P-3799	CV of Ronald W. Maris, PhD	Hearsay; Hearsay within hearsay; Irrelevant; Probative Value Outweighed; Relevance	
P-3803	Presentation: Suicide and SSRIs, Ronald Wm Maris, PhD, A.A.F.S. Annual Conference, February 20, 2007	Hearsay; Hearsay within hearsay; Irrelevant; Probative Value Outweighed; Relevance	
P-3823	Presentation: Neurontin Market Assessment Meeting	Hearsay; Hearsay within hearsay; Probative Value Outweighed; Relevance: Marketing	
P-3856	McCormick Consultation, LLC invoices to Shook, Hardy & Bacon	Document Not Produced	
P-3867	Appendix C.3 Narrative Summaries and Tabular Data for Study Participants Who Withdrew Due to Adverse Events	Authenticity; Probative Value Outweighed; Relevance: Other Events; Rule of Completeness	
P-3868	Gabapentin Open Label-Treatment Forms	Hearsay; Probative Value Outweighed; Relevance; Relevance: Other Events	
P-3901	Presentation: The Neurontin and Pregabalin Positioning Study, May 2001	Hearsay; Hearsay within hearsay; Probative Value Outweighed; Relevance: Marketing; Relevance: Other Events	
P-3982	Presentation: Neurontin 2004 Operating Plan, September 30, 2003	Hearsay within hearsay; Probative Value Outweighed; Relevance; Relevance: Marketing	
P-3986	Email from Suzanne Doft to Avanish Mishra re: NEU-0019169 Article: Change in Opioid use after the initiation of gabapentin therapy	Authenticity; Hearsay within hearsay; Probative Value Outweighed; Relevance; Relevance: Marketing	

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P-3989	Presentation: Neurontin Business in 2H 2004	Hearsay within hearsay; Probative Value Outweighed; Relevance; Relevance: Marketing	
P-3996	US Neurontin Marketing Team 2004 Goals	Probative Value Outweighed; Relevance: Marketing	
P-4034	Memo from Cynthia de Luise re: Draft: Neurontin PMP Team Meeting (09 May 2001) Minutes	Probative Value Outweighed; Relevance: Marketing	
P-4038	Pfizer Drug Safety (Ann Arbor) Product Reference Guide Gabapentin CI #0945, NDA #20-235, International Birth Date Feb. 5, 1993	Authenticity; Rule of Completeness	
P-4040	Email from Michael Campbell to Cathy Sigler, Cynthia de Luise, Christopher Pacella, Larry Alphs, Leslie Tive, Rudolf Altevogt, Ma	Rule of Completeness	
P-4042	Appendix, Second Safety Update Summary of Adverse Events	Probative Value Outweighed; Relevance: Other Events; Rule of Completeness	
P-4045	Summary of Spontaneous Post-Marketing Reports for Gabapentin, as of March 31, 2002 All Cases	Probative Value Outweighed; Relevance: Other Events	
P-4048	Angina Pectoris-Chest Pain-Chest Pain Substernal-Pain Chest and Gabapentin (Draft)	Relevance	
P-4053	Memo from Alan Walker to Dr. Klaus Laesecke, Dr. Mark Pierce, Ms. Lene Ulrich re: \$500 Million	Hearsay within hearsay; Probative Value Outweighed; Relevance; Relevance: Marketing	
P-4056	Memo from Atul Pande to John Boris re: Gabapentin approvals	Probative Value Outweighed; Relevance: Foreign Labels; Relevance: Marketing	
P-4069	Email from Lloyd Knapp to Timothy Hsu re: Gabapentin in bipolar disorder: randomized controlled trials	Hearsay within hearsay; Irrelevant: Other indications; Other; Probative Value Outweighed; Relevance; Relevance: Marketing	

Exhibit Number	Document Description	Defendants' Objections	Impact of Court's Ruling
P-4082	Parke-Davis Pharmaceutical Research Division of Warner-Lambert Company Research Report Title: Investigators' Brochure – Neurontin	Rule of Completeness	
P-4087	Chart: AER ID- AER NO-SEQ REACT-NAME-PF_NAME-HIT NAME-HLGT NAME-SOC NAME-DATE REPORTED-YQ-SENOUS REPORT-CLINICAL TRIAL	Probative Value Outweighed;Relevance: Other Events	
P-4132	MedWatch report	Hearsay within hearsay;Probative Value Outweighed;Relevance: Other Events	
P-4133	Case details	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Other Events	
P-4143	Memo to Mary Parks from Kate Gelperin, Lanh Green re: Thiazolidinediones and Cardiovascular Adverse Effects	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance;Relevance: Other Events	
P-4144	Graph: Percentage of Cardiac SOC Reports for Various Anti-Diabetic Drugs	Probative Value Outweighed;Relevance;Relevance: Other Events	
P-4148	Parke-Davis Pharmaceutical Research Division, Warner-Lambert Company Gabapentin Open-Label Treatment Forms	Hearsay within hearsay;Probative Value Outweighed;Relevance: Other Events	
P-4149	Parke-Davis Pharmaceutical Research Division, Warner-Lambert Company Gabapentin Open-Label Treatment Forms	Hearsay within hearsay;Probative Value Outweighed;Relevance: Other Events	
P-4157	Assessment of Suicide and Related Behaviors in Patients Treated with the – Ligands, Gabapentin and Pregabalin, April 29, 2008	Hearsay within hearsay;Probative Value Outweighed;Relevance: New Warning;Relevance: Other Events	
P-4160	Pfizer Neuropathic Pain PBM Advisory Board Executive Summary, March 3-4, 2002	Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing	
P-4235	Lidoderm Label	Relevance	
P-4253	Description of gabapentin	Hearsay;Hearsay within hearsay	

Exhibit Number	Document Description	Defendants' Objections	Impact of Court's Ruling
P-4254	Summary of gabapentin	Hearsay;Hearsay within hearsay	
P-4256	Summary of neurontin	Hearsay within hearsay	
P-4265	Email from John Marino re: National Public Radio – Neurontin Story to be Aired Tonight	Hearsay;Hearsay within hearsay;Privilege;Probative Value Outweighed;Relevance: Marketing;Relevance: Other Events;Relevance: Plea	
P-4274	Mechanisms of action – A guide for sales colleagues	Hearsay within hearsay;Relevance	
P-4285	Letter from Lesley Frank to William Merino re: Parke-Davis promoting Neurontin for off-label uses	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing	
P-4296	Medical Director – Neurontin	Probative Value Outweighed;Relevance;Relevance: Marketing	
P-4301	Memo from Cynthia De Luise re: Neurontin Product Maintenance and Pharmacovigilance (PMP) Team Meeting (18 October 2001) Minutes	Relevance: Foreign Labels;Relevance: Marketing	
P-4315	Presentation: Neurology Group 2003 Global Operating Plan, July 26, 2002	Probative Value Outweighed;Relevance: Foreign Labels;Relevance: Marketing	
P-4323	Application to Market a New Drug, Biologic, or an Antibiotic Drug for Humane Use	Rule of Completeness	
P-4336	Declaration of Michael Trimble, MD in Relation to Neurontin Causing Negative Mood and Behavioural Alterations, Including Suicidal	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance	
P-4382	Application to Market a New Drug for Human Use or an Antibiotic Drug for Human Use – Neurontin	Rule of Completeness	
P-4386	Memo from Mi Dong to Neurontin (Anticonvulsant) Development Team re: Minutes, March 14, 1995 Neurontin Development Strategy Meeti	Hearsay;Hearsay within hearsay;Other;Privilege;Probative Value Outweighed;Relevance;Relevance: Marketing	

Exhibit Number	Document Description	Defendants' Objections	Impact of Court's Ruling
P-4388	Letter from Paul Leber to Janeth Turner re: supplemental new drug application dated September 13, 1996	Probative Value Outweighed;Relevance	
P-4394	Email from Marino Garcia re: Key Messages	Hearsay within hearsay;Probative Value Outweighed;Relevance	
P-4416	Parke-Davis Pharmaceutical Research, titled: A Double-Blind Placebo-Controlled Trial with 3 Doses of Gabapentin for Treatment of	Relevance;Rule of Completeness	
P-4418	Gabapentin vs. Placebo in Patients with Neuropathic Pain. A Randomized, Double-Blind, Cross-Over, Multi-Center Study in the Nordi	Hearsay within hearsay;Probative Value Outweighed;Relevance: Other Events	
P-4422	Parke-Davis Pharmaceutical Research, titled: Gabapentin Adjunctive Treatment in Patients with Bipolar Disorder	Hearsay within hearsay;Other;Probative Value Outweighed;Relevance: Other Events;Rule of Completeness	
P-4425	Goadecke AG – Research and Development Report titled: A Double-Blind, Placebo-Controlled, Parallel Group, Multicenter Study of th	Relevance;Rule of Completeness	
P-4429	Summary: Neurontin is not approved by the FDA for perioperative treatment of pain	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Other Events;Rule of Completeness	
P-4430	Parke-Davis Pharmaceutical Research Report titled: A Single-Dose, Double-Blind, Placebo-Controlled, Comparative Efficacy Study of	Relevance;Rule of Completeness	
P-4440	Summary of Neurontin, Clinical Data	Hearsay;Hearsay within hearsay;Other;Probative Value Outweighed;Relevance;Relevance: Other Events	
P-4441	Parke-Davis Pharmaceutical Research Division Report titled: Integrated Summary of Safety Information of Gabapentin Capsules	Authenticity;Rule of Completeness	

Exhibit Number	Document Description	Defendants' Objections	Impact of Court's Ruling
P-4474	Isotretinoin (marketed as Accutane)	Hearsay; Probative Value Outweighed; Relevance; Relevance: Other Events	
P-4476	MedWatch report	Hearsay; Hearsay within hearsay; Probative Value Outweighed; Relevance: Other Events	
P-4487	Serious Adverse Events, Gabapentin Related Clinical Study Cases 01-01-1980-31-12-2003	Hearsay; Hearsay within hearsay; Probative Value Outweighed; Relevance: Foreign Labels; Relevance: Other Events	
P-4496	Slide titled: Top 10 Uses of Neurontin	Hearsay; Irrelevant: Other indications; Probative Value Outweighed; Relevance: Marketing	
P-4527	Page from 01/09/2002 Neurontin Publications Subcommittee Plans	Authenticity; Hearsay; Probative Value Outweighed; Relevance: Marketing; Rule of Completeness	
P-4529	Marketing Assessment: Neurontin in Psychiatric Disorders	Authenticity; Hearsay; Probative Value Outweighed; Relevance: Foreign Labels; Relevance: Marketing	
P-4530	Parke-Davis Memorandum: Neurontin Verbatims	Hearsay; Hearsay within hearsay; Probative Value Outweighed; Relevance: Marketing	
P-4531	Neurontin 1996 SE CBU Plan	Authenticity; Hearsay; Probative Value Outweighed; Relevance; Relevance: Marketing	
P-4532	Neurontin Marketing Assessments	Hearsay; Probative Value Outweighed; Relevance: Marketing	
P-4533	Neurontin Northeast CBU 1997	Hearsay; Probative Value Outweighed; Relevance: Marketing	
P-4534	T196 Neurontin/Pharmaceutical Sector 1996 Operating Plan	Probative Value Outweighed; Relevance: Marketing; Rule of Completeness	

Exhibit Number	Document Description	Defendants' Objections	Impact of Court's Ruling
P-4535	Letter to Phil Magistro from Jacki Gordon	Hearsay; Probative Value Outweighed; Relevance: Marketing	
P-4536	Parke-Davis Memorandum: Selected Physician Titration Update	Hearsay; Probative Value Outweighed; Relevance: Marketing	
P-4537	Parke-Davis Marketing Planning: Meeting Minutes/Action Items from Marketing Council Meeting Feb 28-March 2, 1995, Lyon, France	Hearsay; Hearsay within hearsay; Probative Value Outweighed; Relevance: Foreign Labels; Relevance: Marketing	
P-4538	Parke-Davis Memorandum: Minutes, November 14, 1995, Neurontin Development Team Meeting	Hearsay; Probative Value Outweighed; Relevance: Foreign Labels; Relevance: Marketing	
P-4539	1998 Strategic Plan and A and P Allocation Grid	Hearsay; Probative Value Outweighed; Relevance; Relevance: Marketing; Rule of Completeness	
P-4540	Rx List website, "Seldane," http://www.rxlist.com/cgi/generic/terfen.htm , accessed October 22, 2007.	Document Not Produced	
P-4541	MediceNet.com website, "Definition of Placebo Effect," http://www.medterms.com/script/main/art.asp?articlekey=31481 , accessed October 22, 2007.	Document Not Produced	
P-4542	Mayo Clinic website, http://www.mayoclinic.com/health/postherpeticneuralgia/DS00277 , accessed October 22, 2007.	Document Not Produced	
P-4543	King, C., Statement Before the Committee on Governmental Affairs, Subcommittee on Oversight of Government Management, Restructuring and the District of Columbia, United States Senate, May 14, 2002 (available at http://hsgac.senate.gov/051302king.pdf) as	Authenticity; Hearsay; Hearsay within hearsay; Irrelevant; Probative Value Outweighed; Relevance: Marketing	
P-4544	Drugs.com website, http://www.drugs.com/top200_2003.html , accessed October 22, 2007.	Authenticity; Document Not Produced; Hearsay; Irrelevant; Probative Value Outweighed	
P-4545	21 CFR 202.1.	Authenticity; Hearsay	

Exhibit Number	Document Description	Defendants' Objections	Impact of Court's Ruling
P-4546	Interoffice Memorandum from Atul Pande: Gabapentin Psychiatric Studies	Hearsay; Probative Value Outweighed; Relevance; Relevance: Marketing	
P-4547	Parke-Davis Memorandum: Meeting Minutes, October 18, 1994, Neurontin Development Team Meeting	Hearsay; Hearsay within hearsay; Probative Value Outweighed; Relevance: Marketing	
P-4548	Parke-Davis Memorandum: Meeting Minutes, January 17, 1995, Neurontin Development Team Meeting	Probative Value Outweighed; Relevance: Foreign Labels; Relevance: Marketing; Rule of Completeness	
P-4549	Parke-Davis Memorandum: Meeting Minutes, February 21, 1995, Neurontin Development Team Meeting	Hearsay; Hearsay within hearsay; Probative Value Outweighed; Relevance; Relevance: Foreign Labels; Relevance: Marketing	
P-4551	Neurontin Publication Planning 2003 by Allison Fannon	Authenticity; Hearsay; Hearsay within hearsay; Probative Value Outweighed; Relevance; Rule of Completeness	
P-4552	V082761	Irrelevant; Marketing; Other Indications; Probative Value Outweighed	
P-4553	Parke-Davis Product Planning	Hearsay; Probative Value Outweighed; Relevance: Marketing; Rule of Completeness	
P-4554	Neurontin Core Marketing Team Meeting, New York, NY	Hearsay; Hearsay within hearsay; Probative Value Outweighed; Relevance: Marketing	
P-4555	Parke-Davis Memorandum: Meeting Minutes from August 29, 1995, Neurontin Indications Decision Analysis Group Meeting	Authenticity; Hearsay; Hearsay within hearsay; Probative Value Outweighed; Relevance: Marketing	
P-4556	Neurontin (CI-945) Indication Publications Decision Analysis	Irrelevant; Other Indications; Probative Value Outweighed; Relevance	
P-4557	Emerging Applications in the Uses of AEDs_An Educational Proposal	Authenticity; Hearsay; Hearsay within hearsay; Probative Value Outweighed; Relevance; Relevance: Marketing	

Exhibit Number	Document Description	Defendants' Objections	Impact of Court's Ruling
P-4558	Northeast CBU 1997 Situation Analysis	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing;Relevance: Other Events	
P-4560	Parke-Davis Fax from Alan Walker	Hearsay;Probative Value Outweighed;Relevance: Marketing;Relevance: Other Events	
P-4562	US Department of Justice, "Warner-Lambert to Pay \$430 Million to Resolve Criminal & Civil Health Care Liability Relating to Off-Label Promotion,"available at http://www.usdoj.gov/opa/pr/2004/May/04_civ_322.htm , accessed October 14, 2007.	Authenticity;Document Not Produced;Irrelevant: Plea;Probative Value Outweighed	
P-4563	Fax including the Exploratory Development Plan for Psychiatric Indications for Gabapentin	Authenticity;Hearsay within hearsay;Irrelevant: Other indications;Rule of Completeness	
P-4564	Neurontin 2002 Operating Plan	Authenticity;Relevance: Marketing;Rule of Completeness	
P-4565	Neurontin US Field Force Allocation	Authenticity;Probative Value Outweighed;Relevance: Marketing;Rule of Completeness	
P-4566	2001 Key Issues and Strategies	Authenticity;Probative Value Outweighed;Relevance: Marketing;Rule of Completeness	
P-4567	Share of Voice Data	Hearsay;Rule of Completeness	
P-4568	Page from 01/09/2002 Neurontin Publications Subcommittee Plans	Hearsay;Irrelevant: Marketing;Probative Value Outweighed;Relevance;Rule of Completeness	
P-4569	Neurontin Article Series	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance;Relevance: Marketing	

Exhibit Number	Document Description	Defendants' Objections	Impact of Court's Ruling
P-4570	Page from 01/09/2002 Neurontin Publications Subcommittee Plans	Hearsay;Other Indications;Probative Value Outweighed;Relevance;Relevance: Marketing;Rule of Completeness	
P-4571	Page from 01/09/2002 Neurontin Publications Subcommittee Plans	Hearsay;Irrelevant: Marketing;Probative Value Outweighed;Rule of Completeness	
P-4572	Parke-Davis Memorandum: Neurontin Marketing Assessment	Hearsay;Hearsay within hearsay;Other;Probative Value Outweighed;Relevance: Foreign Labels;Relevance: Marketing	
P-4574	Greenland re: gabapentin	Authenticity;Hearsay;Hearsay within hearsay;Probative Value Outweighed	
P-4577	Blunberg, Alan. (March 30, 1992) Memo to Distribution: Gabapentin MAA – Product Profile. International Regulatory Affairs, Parke-Davis Pharmaceutical Research Division, Warner-Davis Company.p. 3.	Authenticity;Document Not Produced;Irrelevant: Foreign Labeling;Probative Value Outweighed	
P-4578	Page from FDA FOI Documents for Neurontin NDA Approval	Authenticity;Document Not Produced;Rule of Completeness	
P-4580	Warner-Lambert. (4/8/1988) Gabapentin versus placebo in Patients with Partial Seizures, Patient CKS #213, Protocol #945-5---1. Warner-Lambert International. 154-155, 349, 352, 363.	Authenticity;Document Not Produced;Irrelevant: Other Events;Probative Value Outweighed	
P-4582	193	Authenticity;Document Not Produced;Irrelevant;Probative Value Outweighed	
P-4583	Pfizer (alpha-2-gamma) Compounds in Development, January 2002	Relevance	
P-4584	Parke-Davis. (Aug 2003) Neurontin (Gabapentin) Capsules: Neurontin (Gabapentin) Tablets: Neurontin (Gabapentin) Oral Solution. Lori Murray, Senior Ed. PDR: 58 Edition: 2004: Physicians Desk Reference. Thompson PDR. Montvale, NJ. 2004. 2559.	Document Not Produced;Relevance	

Exhibit Number	Document Description	Defendants' Objections	Impact of Court's Ruling
P-4587	Investigator's Brochure Neurontin (gabapentin) October 2001	Hearsay;Hearsay within hearsay;Other;Probative Value Outweighed	
P-4599	Pediatric ISS	Rule of Completeness	
P-4600	Appendix 5, Pfizer Safety and Risk Management Literature Review: Gabapentin Use Among Persons with a History of Psychotic Disorder	Irrelevant: Other indications;Probative Value Outweighed;Relevance	
P-4609	Letter from Dr. Russell Katz, Director, FDA Division of Neuropharmacology to Pfizer (March 16, 2005) .	Relevance	
P-4611	Appendix 4, Pfizer Response to EMEA, (December 14, 2005) Pfizer_Jmohan_0000479.	Authenticity;Hearsay	
P-4688	Neurontin Studies	Hearsay;Relevance: Marketing	
P-4689	Letter to James Parker re: NDA# 20-235 Neurontin (gabapentin capsules) MACMIS ID# 3323	Hearsay;Probative Value Outweighed;Relevance: Marketing	
P-4690	Parke-Davis Memorandum: Meeting Minutes-February 25, 1997, Neurontin Development Team Meeting	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Foreign Labels;Relevance: Marketing	
P-4691	Parke-Davis Memorandum: Minutes-April 22, 1997, Neurontin Development Team Meeting	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Foreign Labels;Relevance: Marketing	
P-4692	Letter to William Marino re: NDA 20-235 Neurontin (gabapentin capsules) MACMIS File ID# 4162	Hearsay;Probative Value Outweighed;Relevance: Marketing	
P-4693	Letter to Joan Hankin re: Advertizing MACMIS ID# 3424	Hearsay;Probative Value Outweighed;Relevance: Marketing	
P-4694	Fax to B. Garofalo from L. Hayes re: Gabapentin for Treatment of Pain Consultants Meeting, September 28, 1995; Boston, MA	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing;Relevance: Other Events	
P-4695	Warner-Lambert Company Responses to Questions 1-7 and Specifications 12, 13 and 14	Hearsay;Probative Value Outweighed;Relevance: Marketing	

Exhibit Number	Document Description	Defendants' Objections	Impact of Court's Ruling
P-4696	Summary of teleconference	Hearsay;Hearsay within hearsay;Non-final agency finding;Probative Value Outweighed;Relevance: Other Events	
P-4699	Letter to James Parker re: NDA# 20-235 Neurontin (gabapentin capsules) MACMIS ID# 3323	Hearsay;Non-final agency finding;Probative Value Outweighed;Relevance: Marketing;Relevance: Other Events	
P-4701	Letter to Lesley Frank re: MACMIS File ID #4162 NDA-20-235, Neurontin (gabapentin capsules)	Hearsay;Probative Value Outweighed;Relevance: Marketing	
P-4702	Executive Summary- Suicide Rates in Neurontin-treated Population Groups	Hearsay;Irrelevant: Other indications	
P-4703	Research Study report: An open-label multicenter study of the safety and efficacy of gabapentin as monotherapy or add-on therapy in the long-term treatment of epileptic seizures	Hearsay;Irrelevant: Other indications;Probative Value Outweighed;Relevance: Foreign Labels	
P-4704	JONCA BULL STATEMENT	Probative Value Outweighed;Relevance	
P-4705	WARNER-LAMBERT TO PAY \$430 MILLION	Authenticity;Hearsay;Irrelevant: Plea;Probative Value Outweighed	
P-4706	WLC_JTURNER_000284	Relevance	
P-4708	Charles Dellinger vs. Pfizer, Summons to Proceed before a Magistrate Judge	Hearsay;Hearsay within hearsay;Other;Probative Value Outweighed;Relevance;Relevance: Marketing;Relevance: Other Events	
P-4710	Suicide Clinical Communications Letter	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Other Events	
P-4713	FDA Contact Report	Hearsay;Hearsay within hearsay;Relevance: New Warning	
P-4714	Letter to Andrea Garrity re: NDA #s 20-235, 20-882 Neurontin (gabapentin) MACMIS # 10174	Probative Value Outweighed;Relevance: Marketing	

Exhibit Number	Document Description	Defendants' Objections	Impact of Court's Ruling
P-4715	Potential for Drug Abuse with Gabapentin: A Post-Marketing Safety Analysis	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Other Events	
P-4717	Fax transmittal of letter to Lucy Castro re: Neurontin	Hearsay;Probative Value Outweighed;Relevance: Marketing	
P-4719	Email from Michelle Clausen re: Neurontin-med info letter	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: New Warning;Rule of Completeness	
P-4720	NDA21397 MISC 008 0085	Hearsay	
P-4722	Letter to Sherry Danese re: Advertising and Promotion	Hearsay;Probative Value Outweighed;Relevance: Marketing	
P-4723	AER_SOURCE_0145583	Hearsay;Hearsay within hearsay;Relevance: Other Events	
P-4724	Pfizer Meeting Minutes Summary	Irrelevant: Other indications	
P-4725	Parke-Davis Memorandum: Gabapentin MAA-Product Profile	Hearsay	
P-4726	Parke-Davis Worldwide Regulatory Affairs FDA Contact	Hearsay;Relevance: Other Events	
P-4727	JANET WOODCOCK STATEMENT	Authenticity;Hearsay;Irrelevant;Probative Value Outweighed	
P-4728	Pfizer Drug Safety (Ann Arbor) Product Reference Guide Gabapentin CI#0945 NDA#20-235 International Birth Date (IBD) February 5, 1993	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Other Events	
P-4729	Letter to Russell Katz re: Request for Information-Response to FDA suicidality request	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: New Warning	
P-4730	GABITRIL PUBLIC HEALTH ADVISORY	Hearsay;Irrelevant: Other Events;Probative Value Outweighed	
P-4731	DAVID FRANKLIN AFIDAVIT – MAY 19, 2003	Authenticity;Document Not Produced;Hearsay;Irrelevant: Plea;Probative Value Outweighed	

Exhibit Number	Document Description	Defendants' Objections	Impact of Court's Ruling
P-4734	DEAR DR. LETTER – ELDEPRYL	Authenticity;Document Not Produced;Hearsay;Irrelevant: Other Events;Probative Value Outweighed	
P-4735	ISOTRETINOINHCP	Hearsay;Irrelevant: Other Events;Probative Value Outweighed	
P-4736	LYRICA_2005	Authenticity;Document Not Produced;Hearsay;Irrelevant: Other Events	
P-4737	Section 3.1 (Background) for NDA 21-397	Hearsay within hearsay	
P-4738	Research Report No: RR 740-03075	Relevance	
P-4739	Neurontin Warning Label	Relevance	
P-4741	Research Report No: RR 720-04174	Relevance	
P-4743	Research Report No: RR 720-04231	Relevance	
P-4744	Research Report No: RR 720-04232	Relevance	
P-4745	Research Report No: RR 720-03893	Relevance: Other Events	
P-4747	Research Report No: RR 720-03891	Relevance: Other Events	
P-4748	Research Report No: RR 740-03253	Relevance: Other Events	
P-4753	Dear Healthcare Professional Letter from Bill Sigmund	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance	
P-4754	Fax sent to James Parker re: NDA#20-235 Neurontin (gabapentin) capsules MACMIS ID# 3224	Hearsay;Probative Value Outweighed;Relevance: Marketing	
P-4755	Research Report No: RR 720-04363	Relevance: Other Events	
P-4756	Parke-Davis Memorandum: Gabapentin Analgesia Studies	Relevance	
P-4758	Postmarketing Experience Report according to CIOMS II April 1993 to May 22, 1995	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Foreign Labels;Relevance: Other Events	
P-4759	Periodic Safety Update Report Gabapentin February 1, 2003 through January 31, 2004	Relevance: Foreign Labels;Relevance: Other Events	
P-4760	Email from Manini Patel to Tina Ho re: Neurontin	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Foreign Labels	
P-4761	Email from Tina Ho to Steve Baldwin re: Neurontin and Suicide	Hearsay within hearsay	

Exhibit Number	Document Description	Defendants' Objections	Impact of Court's Ruling
P-4762	Report on Gabapentin and Suicide	Hearsay;Hearsay within hearsay;Probative Value Outweighed	
P-4763	Research Report No: RR 720-03894	Relevance	
P-4764	Research Report No: RR 740-02959	Relevance: Other Events	
P-4766	Research Report No: RR 4301-00124	Relevance	
P-4844	FDA Amicus Brief regarding Neurontin and Suicidality dated July 1, 2008	Authenticity;Hearsay;Irrelevant: New Warning;Probative Value Outweighed	
P-4849	Neurontin 1996 SE CBU Plan	Hearsay;Probative Value Outweighed;Relevance: Marketing	
P-4850	Parke-Davis Memorandum: Reporting of Neurontin Indication Publications Analysis	Hearsay;Probative Value Outweighed;Relevance;Rule of Completeness	
P-4851	8/2/2001 Neurontin Field Force Allocation	Hearsay;Probative Value Outweighed;Relevance;Relevance: Marketing	
P-4852	Email sent to Michelle Mays from Leslie Tive re: April PSC meeting action report	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing;Relevance: Other Events	
P-4854	Letter to Andrea Garrity re: NDA #s 20-235, 20-882 Neurontin (gabapentin) MACMIS # 10174	Hearsay;Probative Value Outweighed;Relevance: Marketing	
P-4855	Email sent from John Marino re: Neurontin, Boston Globe Report, November 25, 2002	Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing;Relevance: Plea	
P-4856	Neurontin Publications Subcommittee Current Status and 2002 Plans	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Foreign Labels;Relevance: Marketing	
P-4858	Fax including a copy of the Meeting Minutes of the Core Marketing Team Meeting with conclusions and action items	Authenticity;Hearsay;Probative Value Outweighed;Relevance: Marketing;Rule of Completeness	

Exhibit Number	Document Description	Defendants' Objections	Impact of Court's Ruling
P-4859	Conclusions and Action Items: Neurontin	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Foreign Labels;Relevance: Marketing;Relevance: Other Events	
P-4860	Neurontin Core Marketing Team Meeting in New York, NY	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing	
P-4861	Parke-Davis Memorandum: Meeting Minutes from August 29, 1995 Neurontin Indications Decision Analysis Group Meeting	Authenticity;Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing	
P-4862	Email sent from Francie Kivel re: Neurontin Indication Publications Analysis Report (includes Appendices)	Hearsay;Other;Probative Value Outweighed;Relevance;Rule of Completeness	
P-4865	Email sent from John Marino re: Neurontin GDRC Presentation	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing;Rule of Completeness	
P-4866	AED Advisory Board Presentations by Mike Valentino	Authenticity;Relevance	
P-4867	Neurontin Publication Planning 2003 by Allison Fannon	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance;Relevance: Foreign Labels;Relevance: Marketing	
P-4868	USPTO Patent Full-Text and Image Database	Hearsay;Hearsay within hearsay;Relevance	
P-4869	Gabapentin PPT slides	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Foreign Labels;Relevance: Other Events	
P-4870	Email sent to John Marino from Steve Piron re: GDRC Meeting Minutes for September 19, 2001	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance;Rule of Completeness	

Exhibit Number	Document Description	Defendants' Objections	Impact of Court's Ruling
P-4871	Neurontin 2002 Operating Plan PPT Slides	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Foreign Labels;Relevance: Marketing;Relevance: Other Events	
P-4872	Neurontin PPT slides	Hearsay;Hearsay within hearsay	
P-4873	Neurontin (CI-945) Indication Publications Decision Analysis	Hearsay;Probative Value Outweighed;Relevance: Marketing	
P-4875	Email sent from David Probert re: Publication of Key Studies	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Foreign Labels;Relevance: Marketing;Rule of Completeness	
P-4878	Pfizer Consultants Meeting	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing	
P-4879	Expert Meeting Report: development of compounds for neuropathic pain	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Foreign Labels;Relevance: Other Events	
P-4880	Global Development Review Committee Meeting Minutes	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Foreign Labels;Relevance: Marketing	
P-4881	Letter to Phil Magistro from Jacki Gordon	Authenticity;Hearsay;Probative Value Outweighed;Relevance: Marketing	
P-4882	Parke-Davis Memorandum: Neurontin Marketing Assessments	Hearsay;Probative Value Outweighed;Relevance: Marketing	
P-4883	Interoffice Memorandum from Atul Pande: Gabapentin Psychiatric Studies	Hearsay;Probative Value Outweighed;Relevance;Relevance: Marketing	
P-4884	Parke-Davis Memorandum: Meeting Minutes, October 18, 1994, Neurontin Development Team Meeting	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing	

Exhibit Number	Document Description	Defendants' Objections	Impact of Court's Ruling
P-4885	Parke-Davis Memorandum: Minutes, January 17, 1995, Neurontin Development Team Meeting	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Foreign Labels;Relevance: Marketing	
P-4886	Parke-Davis Memorandum: Meeting Minutes, February 21, 1995, Neurontin Development Team Meeting	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing	
P-4888	Parke-Davis Memorandum: Meeting Minutes, November 14, 1995, Neurontin Development Team Meeting	Hearsay;Probative Value Outweighed;Relevance: Foreign Labels;Relevance: Marketing	
P-4890	Articles on Antiepileptic Drug Use in Epilepsy and Other Disorders Project Status as of July 18, 1997	Hearsay;Probative Value Outweighed;Relevance;Relevance: Marketing	
P-4891	Invoices #s: 7094, 7093, 7014, 7065, 7064	Hearsay;Probative Value Outweighed;Relevance;Relevance: Marketing	
P-4892	Neurontin Northeast CBU 1997	Hearsay;Probative Value Outweighed;Relevance: Marketing	
P-4893	Presentation: ACE Inhibitor South East Share	Hearsay within hearsay;Relevance: Marketing;Relevance: Other Events	
P-4894	Neurontin 1996 SE CBU Plan	Hearsay;Probative Value Outweighed;Relevance: Marketing	
P-4895	1998 Strategic Plan and A and P Allocation Grid Neurontin	Hearsay;Probative Value Outweighed;Relevance: Marketing	
P-4896	Parke-Davis Memorandum: Selected Physician Titration Update	Hearsay;Probative Value Outweighed;Relevance: Marketing	
P-4897	Parke-Davis Memorandum: Neurontin Verbatims	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing	
P-4898	Northeast CBU 1997 Situation Analysis	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing;Relevance: Other Events	

Exhibit Number	Document Description	Defendants' Objections	Impact of Court's Ruling
P-4899	Emerging Applications in the Uses of AEDs, An Educational Proposal	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance;Relevance: Marketing	
P-4900	Neurontin Article Series	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance;Relevance: Marketing	
P-4901	Parke-Davis Memorandum: Neurontin Marketing Assessment (included)	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Foreign Labels;Relevance: Marketing	
P-4902	Parke-Davis Memorandum: Minutes/Action Items from Marketing Council Meeting February 28 – March 2, 1995, Lyon, France	Authenticity;Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing	
P-4903	Marketing Assessment: Neurontin in Psychiatric Disorders	Authenticity;Hearsay;Probative Value Outweighed;Relevance;Relevance: Foreign Labels;Relevance: Marketing	
P-4904	Parke-Davis Memorandum: Neurontin Details	Hearsay;Relevance: Marketing;Rule of Completeness	
P-4905	Emerging Applications in the Use of AEDs	Hearsay;Relevance	
P-4906	Research Report No: RR 4192-0166	Rule of Completeness	
P-4907	Behavioural Disturbance with Gabapentin by Professor Michael Trimble	Hearsay;Hearsay within hearsay	
P-4908	Parke-Davis Memorandum: Gabapentin MAA-Product Profile	Authenticity	
P-4909	Periodic Report: Drug Safety Gabapentin / Neurontin	Hearsay;Hearsay within hearsay;Relevance: Foreign Labels;Relevance: Other Events	
P-4911	RR 740-02866	Authenticity;Rule of Completeness	
P-4929	May 4, 2004 E-mail from Greg Gribko to Douglas Kargman [Pfizer_Ggribko_0002762]	Probative Value Outweighed;Relevance: Other Events	

Exhibit Number	Document Description	Defendants' Objections	Impact of Court's Ruling
P-4939	Periodic Safety Update Report (Gabapentin), United Kingdom, February 1, 2003 through January 31, 2004 [Pfizer_Ggribko_0002764 to	Relevance;Rule of Completeness	
P-4957	""Gabapentin and Suicide"" by Jeffrey Mohan (October 2005)	Hearsay	
P-4963	E-mail from Lesia Tontisakis to Michael Campbell (January 16, 2003, 4:19 PM) [Pfizer_THO_0001634]	Relevance	
P-4964	E-mail from Cathy Sigler to Tina Ho (January 9, 2003, 4:54 PM) [Pfizer_THO_0001633]	Relevance	
P-4969	February 2000 Review of the Neuropsychiatric Adverse Events Reported in Association with the Use of Gabapentin During the Period 1: January 1996 to 31 December 1999, Warner-Lambert's Drug Safety Surveillance [Pfizer_Mevertz_00131185 to 202]	Rule of Completeness	
P-4974	E-mail from James Leonard to Elizabeth Garofalo (February 8,2000) Pfizer_Lknapp_0135257 to 58	Relevance	
P-4991	Tabular Summary of the Indications and Medical History in Cases Reporting Patients Who Committed Suicide or Attempted Suicide While Receiving Gabapentin, by Jigna Shaw, Pharm. D., July 28, 2006 [Pfizer_Mevertz_0091472 to 78]	Relevance	
P-4995	E-mail from Suzanne Doft to Jill Bruzga, et al. (October 9, 2003, 5:07 PM) [Pfizer_Sdoft_0056764]	Relevance	
P-5028	Neurontin (gabapentin) Pharmacology-General mechanism of drug action	Hearsay	
P-5029	Comparison of pharmacology of gabapentin and vigabatrin	Hearsay	
P-5030	Report: Mechanisms of Action of Gabapentin by Charles Taylor	Authenticity;Hearsay	
P-5031	Report: Mechanisms of Action of Gabapentin by Charles Taylor (draft)	Authenticity;Hearsay	

Exhibit Number	Document Description	Defendants' Objections	Impact of Court's Ruling
P-5033	Neurontin Annual Report (August 19, 2003-August 19, 2004)	Hearsay within hearsay	
P-5034	Executive Summary: Mechanisms of Action Data-Sharing Meeting	Authenticity;Hearsay	
P-5083	PFOENIX	Authenticity;Hearsay;Hearsay within hearsay	
P-5101	Parke-Davis Memorandum: Gabapentin MAA-Product Profile	Authenticity	
P-5102	USMI Standard Monthly Reports re: US Medical Information Standard Monthly Reports	Hearsay;Probative Value Outweighed;Relevance: Other Events	
P-5105	Suicide Clinical Communications Letter	Authenticity;Hearsay within hearsay	
P-5106	United States Patent	Hearsay;Hearsay within hearsay	
P-5108	Email sent from John Marino re: Neurontin labeling, Ground rules and Agenda, Meeting, May 22	Hearsay;Hearsay within hearsay	
P-5112	Letter to Douglas Throckmorton, Russell Katz, and Bob Rappaport from Jonathon Parker re: Lyrica (pregabalin) Capsules, etc.	Relevance	
P-5114	10/31/2001 Email from Piron to Doft et al	Hearsay within hearsay;Rule of Completeness	
P-5115	Pain BOP	Hearsay;Probative Value Outweighed;Relevance	
P-5116	BOP Labeling_ Neurontin	Hearsay	
P-5123	Gabapentin PPT slides	Hearsay within hearsay;Rule of Completeness	
P-5128	Neurontin Usage PPT slides	Hearsay;Relevance: Marketing	
P-5129	Query after 1 st Review Gabapentin	Hearsay	
P-5133	Gabapentin Mechanism Work Group Team Chapter	Relevance	
P-5144	Email sent from Manfred Hauben re: FDA request for teleconference with Pfizer to discuss safety concerns with Neurontin	Hearsay;Relevance	
P-5145	Neurontin Medical Initiatives for 2002 PPT slides	Hearsay;Relevance: Marketing	
P-5149	United States Patent	Hearsay;Hearsay within hearsay	

Exhibit Number	Document Description	Defendants' Objections	Impact of Court's Ruling
P-5150	Parke-Davis Memorandum: Neurontin Marketing Assessment	Hearsay within hearsay; Probative Value Outweighed; Relevance: Marketing	
P-5150	Parke-Davis Memorandum: Neurontin Marketing Assessment	Hearsay within hearsay; Relevance: Marketing	
P-5154	Clinical Expert Report and Written Summary of Clinical Studies: Gabapentin for the Treatment of Neuropathic Pain	Hearsay within hearsay	
P-5155	Investigator's Brochure Addendum for Epilepsy Neurontin (Gabapentin), May 2002	Hearsay within hearsay	
P-5160	Gabapentin and Suicide Report	Hearsay within hearsay	
P-5163	Email sent to Leslie Tive from Angela Crespo re: Revised draft of publication for 945-224	Hearsay; Hearsay within hearsay; Probative Value Outweighed; Relevance: Marketing	
P-5171	Suicide Rates in Neurontin Treated Populations	Hearsay; Hearsay within hearsay	
P-5173	Mechanisms of Action of anticonvulsants	Foundation; Hearsay	
P-5185	Psychiatrist Use of Anticonvulsants Discussion Guide	Hearsay; Relevance; Relevance: Marketing	
P-5188	PPT slides Gabapentin	Hearsay; Hearsay within hearsay; Relevance	
P-5193	Neurontin PPT Presentation by Michelle Clausen and Yuan Wang	Hearsay	
P-5198	Adverse Event Reporting Rate (PT)	Hearsay; Hearsay within hearsay	
P-5200	Drugs in Clinical Development for Epilepsy	Hearsay; Relevance	
P-5201	Project Operating Plan (POP)	Hearsay; Relevance	
P-5203	Increase Frequency Analysis	Hearsay; Hearsay within hearsay; Relevance; Rule of Completeness	
P-5204	Neurontin (gabapentin) Tablets Single Moiety Increased Frequency Analysis NDA#20-882	Hearsay; Hearsay within hearsay; Relevance	
P-5205	Neurontin Suicidality Overview Table	Foundation; Hearsay within hearsay; Relevance; Rule of Completeness	

Exhibit Number	Document Description	Defendants' Objections	Impact of Court's Ruling
P-5212	9/13/2001 Email from Mutisya to Murphy et al	Probative Value Outweighed;Relevance	
P-5213	Email sent from Kirk Taylor re: GBP-post amputation pain	Hearsay;Probative Value Outweighed;Relevance	
P-5216	Email sent from Angela Crespo re: Backonja	Hearsay;Hearsay within hearsay;Relevance: Marketing	
P-5219	Adverse Event Reporting Rate (PT)	Hearsay;Hearsay within hearsay;Relevance	
P-5220	FDA Contact Report	Hearsay;Relevance	
P-5223	Costart Report	Foundation;Hearsay	
P-5224	Email sent from Kay Samulak re: Gabapentin MEB assessment	Hearsay;Hearsay within hearsay;Relevance;Relevance: Other Events	
P-5226	MedWatch Mfr Report #041-0912-860001-01	Hearsay;Hearsay within hearsay;Relevance;Relevance: Other Events	
P-5227	Email sent from Julia Su re: Neurontin and Suicide	Hearsay;Hearsay within hearsay	
P-5228	Email sent from Tina Ho re: Neurontin and Suicide	Hearsay;Hearsay within hearsay	
P-5230	MedWatch Mfr Report #001-0945-900031-00	Hearsay;Hearsay within hearsay;Relevance: Other Events	
P-5231	MedWatch Mfr Report #001-0945-940103-00	Hearsay;Hearsay within hearsay;Relevance	
P-5234	Narrative Line Listing AER Number: 032-0945-M0000010	Hearsay;Hearsay within hearsay;Relevance	
P-5235	Narrative Line Listing AER Number: 001-0945-940009	Hearsay;Hearsay within hearsay;Relevance	
P-5239	Serious Adverse Events Gabapentin Clinical Study Cases 01/01/1980-15/10/2003	Hearsay;Hearsay within hearsay;Relevance: Other Events	
P-5240	Letter from Jovi Bacud-van der Kallen re: Periodic Safety Update Report (PSUR) February 1, 1998 through January 31, 2003 Neurontin (gabapentin)	Hearsay;Hearsay within hearsay;Relevance;Relevance: Other Events	
P-5242	Hallucinations and Gabapentin Report (draft)	Hearsay;Hearsay within hearsay;Relevance	
P-5247	MedWatch Mfr Report #001-0945-880004-01	Hearsay;Hearsay within hearsay;Relevance	
P-5249	Warner-Lambert Company WAERS Composite Report Event No: 13089	Hearsay;Hearsay within hearsay;Relevance	

Exhibit Number	Document Description	Defendants' Objections	Impact of Court's Ruling
P-5250	Warner-Lambert Memorandum: Routing Slip: WAERS Reports	Hearsay;Hearsay within hearsay;Relevance	
P-5251	Warner-Lambert Company WAERS Composite Report Event No: 14362	Hearsay;Hearsay within hearsay;Relevance	
P-5252	Warner-Lambert Memorandum: Routing Slip: WAERS Reports	Hearsay;Hearsay within hearsay;Relevance	
P-5253	Warner-Lambert Memorandum: Routing Slip: WAERS Reports	Hearsay;Hearsay within hearsay;Relevance	
P-5254	Warner-Lambert Company WAERS Composite Report Event No: 22288	Hearsay;Hearsay within hearsay;Relevance	
P-5255	Warner-Lambert Memorandum: Routing Slip: WAERS Reports	Hearsay;Hearsay within hearsay;Relevance	
P-5256	Warner-Lambert Company WAERS Composite Report Event No: 14801	Hearsay;Hearsay within hearsay;Relevance	
P-5257	Warner-Lambert Memorandum: Routing Slip: WAERS Reports	Hearsay;Hearsay within hearsay;Relevance	
P-5258	Parke-Davis Memorandum: Follow-up Adverse Event Report	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance	
P-5259	Warner-Lambert Memorandum: Routing Slip: WAERS Reports	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance	
P-5260	Warner-Lambert Memorandum: Routing Slip: WAERS Reports	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance	
P-5261	Warner-Lambert Memorandum: Routing Slip: WAERS Reports	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance	
P-5262	Warner-Lambert Company WAERS Composite Report Event No: 25691	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance	
P-5263	Warner-Lambert Memorandum: Routing Slip: WAERS Reports	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance	
P-5264	Statprobe, Inc.data Clarification Form-Gabapentin C1945-94	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance	
P-5265	Warner-Lambert Adverse Event Report Form	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Other Events	

Exhibit Number	Document Description	Defendants' Objections	Impact of Court's Ruling
P-5266	Parke-Davis Memorandum: Initial Adverse Event Report	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance	
P-5267	Letter addressed to David Dunner re: study of Gabapentin in Bipolar Disorder	Hearsay;Probative Value Outweighed;Relevance;Relevance: Other Events	
P-5268	Letter addressed to Lesley Frank re: MACMIS File ID #4162 NDA-20-235, Neurontin (gabapentin capsules)	Hearsay;Probative Value Outweighed;Relevance;Relevance: Marketing	
P-5271	Research Report No: RR 720-30154	Relevance	
P-5275	Medical Mania	Foundation;Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance;Relevance: Marketing	
P-5279	Letter from William Sigmund re: Neurontin	Hearsay;Probative Value Outweighed;Relevance;Relevance: Marketing;Rule of Completeness	
P-5283	Assessing New Clinical Uses for Neurontin: A Meeting for Neurology and Psychiatry Consultants	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance;Relevance: Marketing	
P-5287	PD Marketing Assessment Neurontin in Psychiatric Disorders	Hearsay;Probative Value Outweighed;Relevance;Relevance: Foreign Labels	
P-5289	Record of FDA Contact	Relevance	
P-5291	Record of FDA Contact	Hearsay;Hearsay within hearsay	
P-5292	Record of FDA Contact	Hearsay;Hearsay within hearsay	
P-5293	Record of FDA Contact	Hearsay;Hearsay within hearsay	
P-5294	Record of FDA Contact	Hearsay;Hearsay within hearsay	
P-5296	Record of FDA Contact	Hearsay;Hearsay within hearsay	
P-5299	1000 Days of NEURONTIN	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance;Relevance: Marketing	
P-5300	2	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance	

Exhibit Number	Document Description	Defendants' Objections	Impact of Court's Ruling
P-5301	945-186	Hearsay;Relevance	
P-5309	ALPHS VIDEO	Authenticity;Foundation;Hearsay;Probative Value Outweighed	
P-5311	ARISGDatabase	Authenticity;Hearsay;Irrelevant;Probative Value Outweighed	
P-5313	Audio Alphs	Authenticity;Foundation;Hearsay;Irrelevant;Probative Value Outweighed	
P-5314	Audio Pande	Authenticity;Irrelevant;Probative Value Outweighed	
P-5315	Audiofiles	Authenticity;Irrelevant;Probative Value Outweighed	
P-5316	Betsy	Authenticity;Irrelevant;Probative Value Outweighed	
P-5319	Clary Audio File	Authenticity;Hearsay;Probative Value Outweighed	
P-5320	CLINICAL PLAN-LT#1-MEDICAL	Hearsay	
P-5323	CMMS	Authenticity;Relevance;Relevance: Foreign Labels	
P-5324	Crognale CMMS and Sherlock Notes	Authenticity;Irrelevant;Probative Value Outweighed	
P-5325	Crognale NDC Data	Authenticity;Hearsay;Irrelevant;Probative Value Outweighed	
P-5326	CTD-pev[g	Hearsay;Probative Value Outweighed;Relevance;Rule of Completeness	
P-5330	Declaration of Joshua Peteet Dated April 14, 2009	Hearsay;Hearsay within hearsay;Relevance;Relevance: Marketing	
P-5334	FDADatabase	Authenticity;Hearsay;Probative Value Outweighed	
P-5336	For the month of March, Neurontin remained one of the top 10 requested products in US Medical Information, with approximately	Hearsay;Probative Value Outweighed;Relevance: Marketing;Rule of Completeness	
P-5338	FW: **REMINDER DUE MONDAY**ACTION REQUIRED: MOA Publications Working Group please review – Heteroaromatic Side-chain Analogs manuscript – Due: 12/6	Hearsay;Hearsay within hearsay	

Exhibit Number	Document Description	Defendants' Objections	Impact of Court's Ruling
P-5341	Fw: Professor Martin Koltzenburg question	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance;Relevance: Other Events	
P-5343	GABA Modulator	Hearsay;Hearsay within hearsay	
P-5344	Gabapentin	Hearsay	
P-5351	Goldman CMMS and Sherlock Notes	Authenticity;Hearsay;Hearsay within hearsay;Irrelevant;Probative Value Outweighed	
P-5352	Goldman NDC Data	Authenticity;Irrelevant	
P-5353	IMSDData	Authenticity;Irrelevant	
P-5358	LEGAL-LT#4-MAJOR MARKETS-USA	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing;Relevance: Plea	
P-5359	LUCY CASTRO DAY FILE 2002	Hearsay;Probative Value Outweighed;Relevance;Relevance: Marketing	
P-5361	Pfizer Neurontin Medical Lit Database	Authenticity	
P-5362	MISSING NARRATIVES	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Other Events	
P-5364	Narratives of Adverse Events Occurring During Clinical Pharmacology and Clinical Studies Considered Serious by	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance;Relevance: Other Events	
P-5365	NDC	Authenticity	
P-5381	Neurontin Monthly US Performance Report	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing;Rule of Completeness	
P-5386	No Slide Title	Hearsay;Probative Value Outweighed;Relevance: Marketing	
P-5388	No Slide Title	Hearsay;Probative Value Outweighed;Relevance: Marketing	
P-5389	No Slide Title	Hearsay;Probative Value Outweighed;Relevance	

Exhibit Number	Document Description	Defendants' Objections	Impact of Court's Ruling
P-5394	MERLIN	Authenticity;Hearsay;Hearsay within hearsay;Irrelevant	
P-5395	Pande Audio	Authenticity;Hearsay;Hearsay within hearsay;Irrelevant	
P-5397	Pfizer Inc – PFE Annual report which provide a comprehensive overview of the company for year ending 12-31-1996	Hearsay within hearsay;Probative Value Outweighed;Relevance	
P-5398	Pfizer Inc – PFE Annual report which provide a comprehensive overview of the company for year ending 12-31-1998	Hearsay within hearsay;Probative Value Outweighed;Relevance	
P-5399	Pfizer Inc – PFE Annual report which provide a comprehensive overview of the company for year ending 12-31-1999	Hearsay within hearsay;Probative Value Outweighed;Relevance	
P-5400	Pfizer Inc – PFE Annual report which provide a comprehensive overview of the company for year ending 12-31-2001	Hearsay within hearsay;Probative Value Outweighed;Relevance	
P-5401	Pfizer Inc – PFE Annual report which provide a comprehensive overview of the company for year ending 12-31-2002	Hearsay within hearsay;Probative Value Outweighed;Relevance	
P-5402	Pfizer Inc – PFE Annual report which provide a comprehensive overview of the company for year ending 12-31-2003	Hearsay within hearsay;Probative Value Outweighed;Relevance	
P-5403	Pfizer Inc – PFE Annual report which provide a comprehensive overview of the company for year ending 12-31-2004	Hearsay within hearsay;Probative Value Outweighed;Relevance	
P-5404	Pfizer Inc – PFE Annual report which provide a comprehensive overview of the company for year ending 12/31/2005	Hearsay within hearsay;Probative Value Outweighed;Relevance	
P-5405	Pfizer Inc – PFE Annual report which provide a comprehensive overview of the company for year ending 12/31/2006	Hearsay within hearsay;Probative Value Outweighed;Relevance	
P-5406	Pfizer Inc – PFE Annual report which provide a comprehensive overview of the company for year ending 12-31-2007	Hearsay within hearsay;Probative Value Outweighed;Relevance	

Exhibit Number	Document Description	Defendants' Objections	Impact of Court's Ruling
P-5407	Pfizer Inc – PFE Annual report which provide a comprehensive overview of the company for year ending 12-31-2008	Hearsay within hearsay;Probative Value Outweighed;Relevance	
P-5408	Pfizer Inc – PFE Quarterly report which provides a continuing view of the company's financial position for quarter ending 03-28-2	Hearsay within hearsay;Probative Value Outweighed;Relevance	
P-5409	Pfizer Inc – PFE Quarterly report which provides a continuing view of the company's financial position for quarter ending 03-29-2	Hearsay within hearsay;Probative Value Outweighed;Relevance	
P-5410	Pfizer Inc – PFE Quarterly report which provides a continuing view of the company's financial position for quarter ending 03-31-2	Hearsay within hearsay;Probative Value Outweighed;Relevance	
P-5411	Pfizer Inc – PFE Quarterly report which provides a continuing view of the company's financial position for quarter ending 04-01-2	Hearsay within hearsay;Probative Value Outweighed;Relevance	
P-5412	Pfizer Inc – PFE Quarterly report which provides a continuing view of the company's financial position for quarter ending 06-29-2	Hearsay within hearsay;Probative Value Outweighed;Relevance	
P-5413	Pfizer Inc – PFE Quarterly report which provides a continuing view of the company's financial position for quarter ending 07-01-2	Hearsay within hearsay;Probative Value Outweighed;Relevance	
P-5414	Pfizer Inc – PFE Quarterly report which provides a continuing view of the company's financial position for quarter ending 07-02-2	Hearsay within hearsay;Probative Value Outweighed;Relevance	
P-5415	Pfizer Inc – PFE Quarterly report which provides a continuing view of the company's financial position for quarter ending 09-28-2	Hearsay within hearsay;Probative Value Outweighed;Relevance	
P-5416	Pfizer Inc – PFE Quarterly report which provides a continuing view of the company's financial position for quarter ending 09-29-2	Hearsay within hearsay;Probative Value Outweighed;Relevance	
P-5417	Pfizer Inc – PFE Quarterly report which provides a continuing view of the company's financial position for quarter	Hearsay within hearsay;Probative Value Outweighed;Relevance	

Exhibit Number	Document Description	Defendants' Objections	Impact of Court's Ruling
	ending 09-30-2		
P-5418	Pfizer Inc – PFE Quarterly report which provides a continuing view of the company's financial position for quarter ending 10-01-2	Hearsay within hearsay; Probative Value Outweighed; Relevance	
P-5424	PMP	Hearsay within hearsay; Probative Value Outweighed; Relevance: Foreign Labels	
P-5426	PowerPoint Presentation	Hearsay; Probative Value Outweighed; Relevance; Relevance: Marketing; Relevance: Other Events	
P-5434	RE: GBP – post amputation pain	Hearsay; Probative Value Outweighed; Relevance; Relevance: Other Events	
P-5436	RE: names of reviewers for Neurontin publications	Hearsay; Hearsay within hearsay; Probative Value Outweighed; Relevance; Relevance: Other Events	
P-5437	RE: names of reviewers for Neurontin publications	Hearsay; Hearsay within hearsay; Probative Value Outweighed; Relevance	
P-5438	Re: National Public Radio- NEURONTIN Story to be aired TONIGHT	Hearsay; Hearsay within hearsay; Probative Value Outweighed; Relevance: Marketing	
P-5440	RE: Neurontin FDA Response	Hearsay; Hearsay within hearsay; Relevance	
P-5441	RE: Neurontin PHN sNDA	Hearsay; Hearsay within hearsay	
P-5449	RR Database	Authenticity; Hearsay; Hearsay within hearsay; Probative Value Outweighed	
P-5450	SAFETY	Hearsay; Hearsay within hearsay; Probative Value Outweighed; Relevance	
P-5451	ShelockDatabase	Authenticity; Hearsay; Hearsay within hearsay; Irrelevant	
P-5452	SOP 6-010	Relevance; Relevance: Other Events	

Exhibit Number	Document Description	Defendants' Objections	Impact of Court's Ruling
P-5453	Study Number	Hearsay;Hearsay within hearsay;Relevance	
P-5651	UNTITLED	Relevance;Relevance: Foreign Labels	
P-5652	UNTITLED	Hearsay;Hearsay within hearsay;Relevance	
P-5653	Verispan	Authenticity;Hearsay;Hearsay within hearsay;Relevance	
P-5654	""All it takes is one"" audio file	Authenticity;Hearsay;Probative Value Outweighed;Relevance: Marketing	
P-5655	""Neurontin Push"" audio file	Authenticity;Hearsay;Probative Value Outweighed;Relevance: Marketing	
P-5656	""Liason Use"" audio file	Authenticity;Irrelevant;Marketing;Probative Value Outweighed	
P-5657	Letter to Robert Gibbons From J.T. Coyle Dated 2/2/2009	Hearsay	
P-5658	Letter to Robert Gibbons From J.T. Coyle Dated 4/27/2009	Hearsay	
P-5659	Letter from Robert Gibbons to the editor of Archives of General Psychiatry dated 3/15/2009	Hearsay	
P-5661	Neurontin Periodic Report 8/19/2005 to 8/18/2006	Hearsay;Relevance	
P-5662	PPT Presentation_Tetrabenazine New Drug Application 21-894	Hearsay;Relevance	
P-5664	Sentencing of case_USA v. Warner-Lambert Company, LLC	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing;Relevance: Plea	
P-5665	September 2008 FDA Health Case Alert on Phenergan (Promethazine)	Hearsay;Hearsay within hearsay;Irrelevant	
P-5666	Internet Article_Suicidal Thoughts and Behavior: Antiepileptic Drugs-Full Version	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: New Warning	

Exhibit Number	Document Description	Defendants' Objections	Impact of Court's Ruling
P-5667	Research Report_Supplemental Data Gabapentin Receptor (alpha-2-delta)-1 Is a Neuronal Thrombospondin Receptor Responsible for Excitatory CNS Synaptogenesis	Authenticity;Hearsay;Hearsay within hearsay;Relevance	
P-5669	PLEA AGREEMENT	Hearsay;Probative Value Outweighed;Relevance: Marketing;Relevance: Plea	
P-5670	U.S. Food and Drug Administration Internet Article_Suicidal Behavior and Ideation and Antiepileptic Drugs	Hearsay;Relevance: New Warning	
P-5671	Settlement Agreement with Pfizer	Hearsay;Irrelevant: Other Events;Probative Value Outweighed;Relevance: Plea	
P-5672	Judgement of case_USA v. Warner-Lambert Company, LLC	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Plea	
P-5673	Letter sent from Michael Sullivan_re: Warner-Lambert Company LLC	Hearsay;Probative Value Outweighed;Relevance: Plea	
P-5674	Parke-Davis Pain AD Board	Hearsay;Relevance	
P-5675	Antiepileptic Drug Trials III 3/14/96	Hearsay	
P-5676	Neurobehavioral Sciences Working Group	Authenticity;Hearsay	
P-5677	5/7/99 Intramed Fax	Hearsay;Relevance	
P-5678	7/31/95 Neurontin Marketing Assessment	Probative Value Outweighed;Relevance: Marketing	
P-5679	Email sent from Allison Fannon_re: Gabapentin Chapter Review-Treatment of Epilepsy	Relevance	
P-5680	Neurontin 2004 US Strategic Clinical Operating Plan Draft	Hearsay;Probative Value Outweighed;Relevance	
P-5681	Neurontin 2002 Operating Plan	Hearsay;Probative Value Outweighed;Relevance;Relevance: Other Events	
P-5682	Neurontin Speaker Training 8/10/2002	Relevance	
P-5683	Presentation Slides	Hearsay;Hearsay within hearsay;Relevance	
P-5684	Email sent to Allison Fannon; Timothy Hsu from Claire Wohlhuter_re: Joint NeP/Fibro/LCP	Other Indications	

Exhibit Number	Document Description	Defendants' Objections	Impact of Court's Ruling
P-5685	Neurontin National Meeting Roster	Authenticity;Hearsay;Relevance	
P-5686	Neuropathic Pain Advisory Board Meeting_General Sessions and Workshops Summary	Hearsay;Relevance	
P-5687	Letter addressed to Allison Fannon_re: Progress in Pain Management for Primary Care Physicians	Authenticity;Relevance	
P-5688	Neurontin Action Plan_POA2-2004	Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing	
P-5689	Neurontin POA Goals Marketing Contest Flyer	Hearsay;Relevance	
P-5690	Email sent from Susanne Batesko_re: Neurontin Publications Report	Relevance;Relevance: Other Events	
P-5691	Final Report_Pfizer Italia S.r.l._Double-Blind, placebo controlled, randomized, multicenter study on the efficacy and safety of gabapentin (Neurontin) as adjuvant analgesic in neuropathic pain in patients with malignancies_Protocol No. 945-420276	Relevance	
P-5692	Clinical Expert Report_Neurontin Neuropathic Pain	Hearsay within hearsay	
P-5693	Presentation Slides_Neurontin Global Goal Alignment 2003	Relevance;Relevance: Foreign Labels	
P-5694	Email sent from Lloyd Knapp_re: QOL abstract for AAN	Relevance	
P-5695	PHN Advisory Board Meeting Summary	Hearsay within hearsay;Relevance	
P-5696	Attendee List	Relevance	
P-5697	Presentation_Treating the Migraine Patient: An Internist's Perspective by Redonda Miller	Hearsay within hearsay;Probative Value Outweighed;Relevance	
P-5698	Presentation Slides_Neurontin vs. Lyrica	Relevance	
P-5699	Email sent from Alisaar Tubolino_re: Neurontin + Opiods	Relevance	
P-5700	Internet Article_Gabapentin as an Adjuvant to Opiod Analgesia for Neuropathic Cancer Pain	Hearsay within hearsay;Relevance	

Exhibit Number	Document Description	Defendants' Objections	Impact of Court's Ruling
P-5701	Michael Fagan's Entire Custodial File	Authenticity;Hearsay;Hearsay within hearsay	
P-5702	A Double-blind Placebo-controlled trial of Gabapentin for treatment of Painful diabetic peripheral neuropathy	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance	
P-5703	Protocol Template	Hearsay within hearsay;Relevance	
P-5704	Neurontin Indication Discussion Slides	Foundation;Hearsay within hearsay	
P-5705	Neuropathic Pain Advisory Board Meeting General Session Summary	Hearsay within hearsay;Relevance	
P-5706	3/29/2004 Memo From Suzanne Doft	Relevance	
P-5707	Neurontin Educational Slide Kit	Hearsay within hearsay;Relevance	
P-5708	Backonja, M. et. Al. Gabapentin for the Symptomatic Treatment of Painful Neuropathy in Patients with Diabetes Mellitus. JAMA 1998; 280(21): 1831-1836.	Hearsay;Hearsay within hearsay;Relevance	
P-5709	Gibbons' Neurontin Study Proposal 2008	Hearsay within hearsay;Relevance;Relevance: New Warning	
P-5711	PFE Neurontin Back-up Slides	Hearsay within hearsay;Relevance;Relevance: New Warning	
P-5712	Email sent from Kevin Phelan_re: BD Section on AED Usage	Hearsay within hearsay;Relevance	
P-5713	Email sent to Christopher Wohlberg from Ed Whalen_re: update	Relevance;Relevance: New Warning	
P-5714	Clinical Protocol Synopsis_Protocol Number A0081047	Hearsay within hearsay;Relevance	
P-5717	Broadening the Neuropathic Pain Algorithm Invitation 12/7/98	Relevance	
P-5718	12/1/98 Press Release	Hearsay within hearsay;Relevance	
P-5719	12/3/98 Fax from K. Lewis to Laura Johnson	Hearsay within hearsay;Relevance;Relevance: Marketing	
P-5720	12/8/97 Memo From Vic Delimata	Hearsay within hearsay;Relevance	

Exhibit Number	Document Description	Defendants' Objections	Impact of Court's Ruling
P-5721	3/14/95 Meeting Minutes	Hearsay within hearsay;Relevance;Relevance: Foreign Labels	
P-5722	3/22/96 Meeting Participant List	Relevance	
P-5723	7/12/95 Letter from Frary to Rizzo	Hearsay;Relevance	
P-5724	letter from Tracy Frary (Miguara Kaplan Assoc) to J Rizzo (P-D) re: topline assessment of the results of the Quantitative Evaluation of the Opportunity for Neurontin	Hearsay;Hearsay within hearsay;Relevance	
P-5725	P-D Portfolio Management Dinners	Relevance	
P-5726	9/18/95 Memo From Griffin to Ulrich	Relevance	
P-5727	8/6/97 Letter from Johnson to Dobson	Relevance	
P-5728	3/4/96 Memo from Johnson to Krukar	Relevance;Relevance: Marketing	
P-5729	Neurontin Advocates	Relevance	
P-5730	PD Post Investigators Meeting 945-211	Hearsay within hearsay;Relevance	
P-5731	Epilepsy Disease Speakers Bureau	Relevance	
P-5732	Neurontin Marketing Assessment in Psychiatric Disorders	Hearsay within hearsay;Probative Value Outweighed;Relevance;Relevance: Marketing	
P-5733	5/19/95 Neurontin Marketing Assessment Psych Disorders	Hearsay within hearsay;Irrelevant;Irrelevant: Marketing	
P-5749	Pfizer Global Research and Development Memorandum: A capsule history of the alpha-2-delta story	Relevance	
P-5760	Pfizer Meeting Agenda	Relevance	
P-5761	Faculty Statement of Financial Interests and Affiliations	Hearsay;Relevance	
P-5762	Parke-Davis Research Report No: RR 995-00070	Hearsay;Relevance	
P-5763	Letter from David Murphy re: Pain Disease State Management Proposal from Key Opinion Leader	Hearsay;Hearsay within hearsay;Relevance	
P-5764	Invitation to dinner program: Broadening the Neuropathic Pain Treatment Algorithm	Hearsay within hearsay;Relevance	
P-5765	Neurontin Publication Planning and Execution	Hearsay;Hearsay within hearsay;Relevance	

Exhibit Number	Document Description	Defendants' Objections	Impact of Court's Ruling
P-5766	Curriculum Vitae of Edgar L. Ross	Hearsay;Relevance	
P-5767	Parke-Davis Medical Research Protocol for Clinical Research Trial	Hearsay;Hearsay within hearsay;Relevance	
P-5768	Memorandum re: Updated Speaker Lists	Hearsay;Hearsay within hearsay;Relevance	
P-5769	MAP-PM 2002 Advisory Board Meeting Agenda	Hearsay within hearsay;Relevance	
P-5770	Article:Neuropathic Pain: The Evolving Role of Anticonvulsants in Pain Management	Hearsay;Hearsay within hearsay;Relevance	
P-5771	PPT NeuroBehavioral Working Group	Hearsay; Hearsay within hearsay; Relevance	
P-5772	The Evolving Role of Anticonvulsants in Pain Management by Edgar L. Ross	Hearsay;Hearsay within hearsay;Relevance	
P-5773	Letter from David Murphy re: Pain Disease State Management Proposal from Key Opinion Leader	Hearsay; Hearsay within hearsay; Relevance	
P-5774	Letter sent from E. Ross to Marilyn Abel re: Pain Programs in July	Hearsay;Hearsay within hearsay;Relevance	
P-5775	Neurontin Update	Hearsay;Hearsay within hearsay;Relevance	
P-5776	Letter sent from Marilyn Abel to E. Ross re: Re your checks	Hearsay;Hearsay within hearsay;Relevance	
P-5778	Letter from James Rouhandeh to Susan Hanson-Philbrick	Hearsay;Hearsay within hearsay	
P-5779	PHN Advisory Board Meeting	Relevance	
P-5780	Attendee List	Relevance	
P-5781	Communications Action Plan re:FDA Review of Labelling	Relevance;Relevance: New Warning	
P-5782	Pfizer Response To FDA Alert on Suicidality	Hearsay within hearsay;Probative Value Outweighed;Relevance	
P-5783	AED Executive Committee Presentation	Hearsay within hearsay;Probative Value Outweighed;Relevance	
P-5784	AED EC Update	Hearsay within hearsay;Irrelevant: New Warning;Probative Value Outweighed;Relevance;Relevance: New Warning	

Exhibit Number	Document Description	Defendants' Objections	Impact of Court's Ruling
P-5785	ELT Update	Hearsay within hearsay; Probative Value Outweighed; Relevance; Relevance: New Warning	
P-5786	Minutes of Lyrica/Neurontin Product Meeting	Probative Value Outweighed; Relevance	
P-5787	Study Protocol	Relevance: New Warning	
P-5789	PowerPoint Presentation: Suicidality and Anti-Epileptic Drugs	Hearsay within hearsay; Relevance	
P-5790	PhRMA Suicidality White Paper	Hearsay; Hearsay within hearsay; Probative Value Outweighed; Relevance	
P-5792	Presentation to Pharmacovigilance Working Party	Probative Value Outweighed; Relevance	
P-5793	AED Advisory Committee Communications Plan	Probative Value Outweighed; Relevance	
P-5794	Email from Phelan to Hakkinen	Relevance; Rule of Completeness	
P-5795	Email from Whalen to Wohlberg Re: update	Probative Value Outweighed; Relevance	
P-5796	Email From Romano to Phelan ReL Update on Israel MOH request	Probative Value Outweighed; Relevance; Relevance: Foreign Labels	
P-5797	Email from Scheer to Wohlberg Re: Russ Portenoy	Hearsay within hearsay; Relevance	
P-5798	Email from Knapp to Wohlberg Rel FDA Alert	Hearsay; Probative Value Outweighed; Relevance	
P-5799	Email from Barrett to Wohlberg	Probative Value Outweighed; Relevance; Relevance: New Warning	
P-5801	Email from Wohlberg to Bykoriz Re; Postmarketing Reports	Relevance	
P-5802	Memo from Eng to Suicidality Assessment Work Group	Relevance	
P-5803	Email from Whlberg to Bijlani ReL FYI AC Members	Hearsay within hearsay; Probative Value Outweighed; Relevance	
P-5804	Email from Wohlberg to French Re: Suicidality and AED meeting.	Probative Value Outweighed; Relevance	
P-5805	Email from Wohlberg to Cox Re: Lyrica	Probative Value Outweighed; Relevance	
P-5806	Suicidality and Anti-Epileptic Drugs Agenda	Probative Value Outweighed; Relevance	

Exhibit Number	Document Description	Defendants' Objections	Impact of Court's Ruling
P-5807	Faculty	Probative Value Outweighed; Relevance	
P-5808	Minutes from the March 23-24, 2009 Suicidality Consensus Conference	Foundation; Hearsay; Relevance	
P-5810	PhVWP Review of AEDs	Hearsay; Probative Value Outweighed; Relevance	
P-5811	Letter from Bartley to Gonzales: Response to Outstanding Questions	Probative Value Outweighed; Relevance; Relevance: Foreign Labels	
P-5812	Antiepileptics and suicide-related PTs/SMQs FDA FOI AERS Q4 2007 Non clinical trial cases	Probative Value Outweighed; Relevance	
P-5813	Reporting Rate For Suicide Chart	Foundation; Probative Value Outweighed; Relevance	
P-5814	Report Rate For Suicide Chart	Foundation; Probative Value Outweighed; Relevance	
P-5815	Reporting Reate For Suicide Chart	Foundation; Probative Value Outweighed; Relevance	
P-5816	Reporting Rate For Suicide	Foundation; Probative Value Outweighed; Relevance	
P-5817	Dear Investigator Letter	Probative Value Outweighed; Relevance	
P-5818	Email from Garofalo to Knapp re: Safety Alert	Probative Value Outweighed; Relevance; Relevance: New Warning	
P-5819	Presentation to Combined Advisory Committee	Probative Value Outweighed; Relevance	
P-5820	email from Cox to Wohlberg Re: Slide 8	Hearsay; Probative Value Outweighed; Relevance	
P-5821	Email from Chappell to Wohlberg re: AED and FDA	Probative Value Outweighed; Relevance	
P-5822	Email from Zeiher to Wohlberg re: Feedback Appreciated	Probative Value Outweighed; Relevance	
P-5823	Email from Schwizer to Wohlberg Re: Neurontin Project	Probative Value Outweighed; Relevance; Rule of Completeness	
P-5824	Email from Whalen to Gooch	Probative Value Outweighed; Relevance; Relevance: Foreign Labels	
P-5825	Email from Feltner to Wohlberg re: Jackie French suicidality methods study	Probative Value Outweighed; Relevance	

Exhibit Number	Document Description	Defendants' Objections	Impact of Court's Ruling
P-5826	Email from Wohlberg to Knapp Re: Jackie French suicidality methods study	Probative Value Outweighed; Relevance	
P-5827	email from Richardson to Wohlberg Rel AED EC Agenda	Hearsay; Probative Value Outweighed; Relevance; Relevance: New Warning	
P-5828	Strategic Risk Management Plan	Probative Value Outweighed; Relevance	
P-5829	Email from Wohlberg to Garcia: ReL So I'm having trouble going to sleep	Hearsay within hearsay; Probative Value Outweighed; Relevance	
P-5830	Lyrica/AED Class Labeling Media Statement	Probative Value Outweighed; Relevance; Relevance: New Warning	
P-5831	Communications Action Plan re:Fda Alert	Probative Value Outweighed; Relevance	
P-5832	Email from Roman to Wohlberg re: WSJ Blog	Hearsay; Probative Value Outweighed; Relevance	
P-5833	Email from Cox re: Summary of AED Media Coverage	Probative Value Outweighed; Relevance; Relevance: New Warning	
P-5834	Pfizer Product Training-Lyrica	Probative Value Outweighed; Relevance	
P-5835	Gabapentin RMC Meeting	Probative Value Outweighed; Relevance	
P-5836	Email from Kremer to Glue re: Assessment of Suicidality	Foundation; Probative Value Outweighed; Relevance	
P-5837	Regulatory Update for AED Executive Committee Meeting	Probative Value Outweighed; Relevance; Relevance: Foreign Labels; Relevance: New Warning	
P-5838	Email from Stamp to DL-Lyrica re : 2005 Lyrica GPP	Probative Value Outweighed; Relevance	
P-5839	Lyrica 2005 Global Product Plan	Probative Value Outweighed; Relevance	
P-5840	CIOMS-I Report	Hearsay; Probative Value Outweighed; Relevance	
P-5841	Lyrica Clinical Trial Evaluation	Hearsay; Probative Value Outweighed; Relevance	
P-5842	Lyrica Additional Clinical Trials	Probative Value Outweighed; Relevance; Relevance: Foreign Labels; Relevance: Marketing	

Exhibit Number	Document Description	Defendants' Objections	Impact of Court's Ruling
P-5843	Post-Marketing Gabapentin Cumulative Review of Suicidality	Hearsay; Probative Value Outweighed; Relevance; Relevance: Foreign Labels	
P-5844	AED AC BOP Scenarios	Probative Value Outweighed; Relevance; Relevance: New Warning	
P-5845	McNamara Email Re: ROC	Probative Value Outweighed; Relevance; Relevance: New Warning	
P-5846	FDA ANALYSIS ON ANTIEPILEPTIC DRUGS AND RISK OF SUICIDALITY	Probative Value Outweighed; Relevance; Relevance: New Warning	
P-5847	Medication Guide	Probative Value Outweighed; Relevance; Relevance: New Warning	
P-5848	Email from McKinnell re: Fourth quarter and Full Year 2000 Financial Results	Hearsay; Hearsay within hearsay; Probative Value Outweighed; Relevance	
P-5849	Neurontin Studies/ JAMA Video News Release	Hearsay; hearsay within hearsay; relevance	
P-5850	MAC Communications Neurontin Powerpoint Dated 10/21/2002	Authenticity; Relevance; probative Value Outweighed	
P-5851	Article: The Effect of Gabapentin on Brain Gamma-aminobutyric Acid in Patients with Epilepsy	Hearsay	
P-5852	Article: Gabapentin raises human brain GABA within thirty minutes	Hearsay Document Not Produced	
P-5853	Review and Evaluation of Clinical Data re: Neurontin	Hearsay Document Not Produced	
P-5854	Settlement Agreement	Relevance: Plea; Probative Value Outweighed	
P-5855	Neurontin Mid-POA1 February 3, 2004	Probative Value Outweighed; Relevance: Marketing	
P-5856	Neurontin 2003 Strategic Planning Meeting	Probative Value Outweighed; Relevance	
P-5857	Neurontin 2001 US Operating Plan October 11, 2000	Hearsay within hearsay; Probative Value Outweighed; Relevance: Marketing	

Exhibit Number	Document Description	Defendants' Objections	Impact of Court's Ruling
P-5859	Handwritten Notes re: Meeting with Leslie and Paula P.	Foundation; Hearsay; Relevance	
P-5860	Gabapentin Presentation	Hearsay	
P-5861	Precision Marketing Fax to Edda Guerrero from Lawton Griffin 8/21/1995 re: AED report on the STEPS Physicians	Hearsay within hearsay; Relevance	
P-5862	Parke-Davis Memo to John Marino 7/24/2000 re: Neurontin Market Research: Rheumatologists and Orthopedists who prescribe Neurontin	Probative Value Outweighed; Relevance: Marketing	
P-5863	1998 Strategic Plan and A&P Allocation Grid for Neurontin	Probative Value Outweighed; Relevance; Relevance: Marketing	
P-5864	SE-CBU Neurontin 2000 A&P Budget	Foundation; Probative Value Outweighed; Relevance: Marketing	
P-5865	Boron-Lepore Neurontin Conferences_132 MDs with ME#s, Events held in Oct 97	Foundation; Probative Value Outweighed; Relevance: Marketing	
P-5866	Parke-Davis Email with attachments sent to Field Sales Colleagues from Epilepsy Disease Team re: AEDs Early Adopters	Probative Value Outweighed; Relevance: Marketing	
P-5867	Neurontin Presentation	Authenticity; Hearsay; Probative Value Outweighed; Relevance: Marketing	
P-5868	Parke-Davis Neurontin Promotional Analyses Presentation_March 13, 1995	Probative Value Outweighed; Relevance: Marketing	

Dated: May 12, 2010

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CERTIFICATE OF SERVICE

I hereby certify that on this the 12th day of May 2010, I electronically filed the foregoing document with the Clerk of the Court, United States District Court for the Middle District of Tennessee, using the CM/ECF system. True and correct copies of the foregoing documents are being served via the Court's CM/ECF system on the following:

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